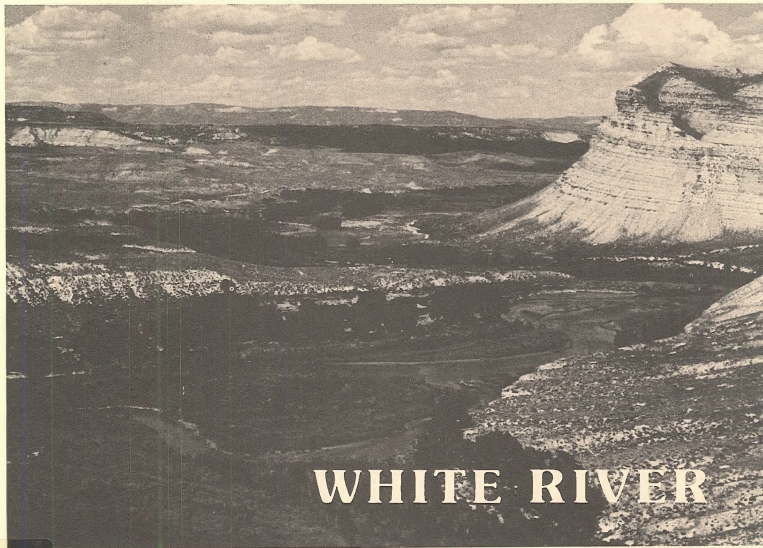




FINAL ENVIRONMENTAL IMPACT STATEMENT



WHITE RIVER

RESOURCE AREA

GRAZING MANAGEMENT





United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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Attached is the White River Grazing Final Environmental Impact Statement (FEIS).

The preparation of this final statement has differed from the past procedure of reprinting a draft statement to incorporate changes resulting from public review. Since few and minor changes are necessary, the draft statement and comments in this document constitute the final environmental impact statement. This revised procedure has saved substantial time, money and paperwork. As noted in the preface, this final must be used in conjunction with the earlier draft statement which was distributed to the public on April 23, 1980.

The White River Resource Area, Craig District of the Bureau of Land Management prepared this environmental impact statement pursuant to Section 102(2)(c) of the National Environmental Policy Act of 1969. The statement describes and analyzes social, environmental and economic impacts that would result from six alternatives of grazing management on 1,521,806 acres of public land in northwestern Colorado. The alternatives considered were: Alternative A - Action Proposal; Alternative B - No Action; Alternative C - Elimination of Livestock Grazing from Public Land; Alternative D - Optimize Livestock Grazing; Alternative E - Emphasis on Other Resource Uses; and Alternative F - Optimize Wild Horses.

This final environmental impact statement is not the decision document. The decision on the action to be taken will be based on the analysis contained in the FEIS, BLM's manpower and budget constraints, public concerns and comments, and other multiple-use resource objectives or programs applicable to the area. No action can be taken for a least 30 days following filing of the final statement with the Environmental Protection Agency and distribution to the public. A brief summary document that outlines the management direction for the White River Resource Area will be prepared and made available as soon as a decision is reached. More specific decisions will be developed on an allotment-by-allotment basis.

Thank you for your interest in this environmental impact statement.



Charles W. Locher
Acting State Director
Colorado

Save Energy and You Serve America!

At the time of the
purchase of the land
the land was in the
Yucca-Badger National Monument
Yucca-Badger National Monument

**PROPOSED GRAZING MANAGEMENT PROGRAM FOR THE WHITE RIVER
RESOURCE AREA**

FINAL ENVIRONMENTAL IMPACT STATEMENT

Prepared by
**BUREAU OF LAND MANAGEMENT
U.S. DEPARTMENT OF THE INTERIOR**


Acting State Director
Colorado State Office



ABSTRACT

() Draft (X) Final Environmental Impact Statement

U.S. Department of the Interior, Bureau of Land Management

1. Type of Action: (X) Administrative () Legislative

2. Abstract: The Bureau of Land Management proposes to implement a well balanced rangeland management program for the White River Resource Area (approximately 1,521,806 acres of public lands) in the Craig District, located in Garfield, Moffat, and Rio Blanco Counties of northwestern Colorado. The overall objective of the proposal (Action Proposal) is to provide an improved rangeland condition capable of supplying 183,460 animal unit months (AUMs) of forage in the short term and 230,330 AUMs by the year 2000 for use by big game wildlife, wild horses, and livestock on a sustained yield basis. The proposal would continue intensive grazing management on 156,471 acres, implement intensive grazing management on 1,299,992 acres, and implement less intensive grazing management on 61,941 acres. Range improvements required to implement intensive management include approximately 186,310 acres of vegetation manipulations, 699 watering facilities, and 212 miles of fence.

Implementation of the proposal would result in rangeland vegetation conditions improving on 581,000 acres and remaining stable on the remainder. Erosion and runoff would decrease as a result of improved watershed conditions. Wildlife forage and habitat conditions would improve and lead to increased populations of deer (11 percent), elk (8 percent), and antelope (2 percent), which would result in an increase of approximately \$2.7 million in hunter/

recreation income for Colorado. The proposal would provide an improved habitat capable of supporting 140 wild horses in the long term. However, the present wild horse range would be reduced by 67 percent to 148,153 acres with an 86 percent reduction in wild horses from the present 625 head to 90 head. The initial reduction in livestock grazing use from the present 136,028 AUMs to 109,575 AUMs (20 percent) would decrease local incomes by \$260,398. Long term livestock grazing use would increase to 156,630 AUMs (13 percent above present use) with favorable increases in local incomes of \$326,874.

3. Alternatives Considered:

- A. Action Proposal
- B. No Action
- C. Elimination of Livestock Grazing from Public Lands
- D. Optimize Livestock Grazing
- E. Emphasis on Other Resource Uses
- F. Optimize Wild Horses

4. Request for Comments: See Consultation and Coordination Section.

5. For Further Information Contact:

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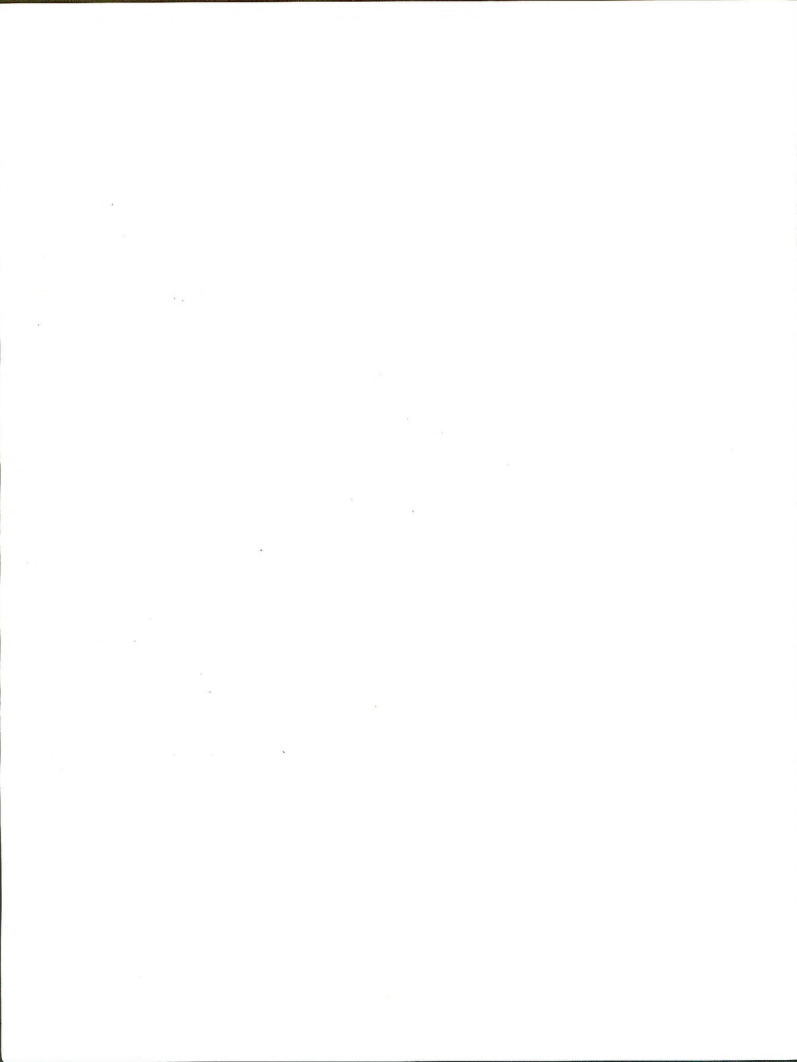
6. Date Statement Made Available to EPA and to the Public:

Draft - April 23, 1980
Final - September, 1980



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PREFACE

The Final Environmental Impact Statement consists of two volumes. Volume 1 was originally distributed as the Draft Environmental Impact Statement (DEIS) in April 1980. Comments on the DEIS did not require significant changes in data, analysis, or conclusions. Therefore, Volume 1 has not been reprinted. A limited number of copies of Volume 1 are available upon request to the:

District Manager
Craig District Office
Bureau of Land Management
P.O. Box 248, 455 Emerson Street
Craig, Colorado 81625

Volume 2 contains Section 6 - Consultation and Coordination in the Review of the Draft EIS and Section 7 - Revisions to the Draft EIS. Section 1 through 5 of Volume 1 are incorporated by reference. Minor corrections to these sections are made in the section entitled Errata.

SUMMARY



SUMMARY

INTRODUCTION

The Bureau of Land Management (BLM), Craig District, proposes to develop a well balanced rangeland management program on 1.5 million acres of public land within the White River Resource Area. Six separate proposals for implementing a management program are considered in this Environmental Impact Statement (EIS). After analysis of each proposal, one is identified as the preferred grazing management program or the preferred alternative.

ALTERNATIVES CONSIDERED

The six alternatives considered and analyzed in the EIS are:

1. Alternative A - Action Proposal
2. Alternative B - No Action (Continuation of Present Management)
3. Alternative C - Elimination of Livestock Grazing from Public Land
4. Alternative D - Optimize Livestock Grazing
5. Alternative E - Emphasis on Other Resource Uses
6. Alternative F - Optimize Wild Horses

All alternatives except Alternative C (Elimination of Grazing) were developed from the 1978-79 revision of the land use plan (Management Framework Plan, MFP) for the White River Resource Area. Alternative B was developed from base data (the present situation) collected on three planning units in the Resource Area. Alternatives D, E, and F were developed from recommendations made in the land use planning process (MFP) for optimizing individual resource values and uses, while Alternative A was developed from the multiple use recommendations made for coordinating all resource values and uses identified through the land use planning process.

ALTERNATIVE A - ACTION PROPOSAL

The objectives of the Action Proposal are to provide improved rangeland conditions capable of supplying 183,460 animal units months (AUMs) of forage in the short term and 230,330 AUMs in the long term for use by wildlife, wild horses, and livestock on a sustained yield basis. In addition, 6.5 miles of Colorado cutthroat trout habitat and 72 acres of riparian vegetation would be protected by

fencing. About 55.5 miles of riparian habitat and 241,000 acres of sage grouse habitat would be designated for improvement through improved livestock grazing management.

The allocation of vegetation is one of the principal issues in the proposal. Fifty percent of the vegetation available was allocated for the combined use of livestock, big game wildlife, or wild horses with the remaining vegetation reserved for plant maintenance, nongame and small game wildlife, and watershed protection.

Initial allocations (short term) would provide 64,521 AUMs of forage for big game wildlife, 1,350 AUMs for wild horses, and 109,575 AUMs for livestock use. The long term (year 2000) allocation would provide increased allocations for big game wildlife (71,599 AUMs) for livestock (156,630 AUMs), and for wild horses (2,101 AUMs).

ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVE A

Rangeland conditions would improve on 581,000 acres of public land which would allow for improvement in soil and watershed conditions. An improvement in forage conditions would occur on an additional 186,000 acres (approximately) undergoing vegetation manipulation. Soil displacement would decrease by 1.6 tons/acre/year, while a decrease in runoff (0.43 inches/acre during high intensity storms) would result in a 5 percent decrease in sediment yield to 2.28 tons/acre/year. Improvements in forage production on wildlife use areas would permit population increases for deer, elk, and antelope to 51,526 (11 percent), 1,926 (8 percent), and 224 (2 percent), respectively. This would create an increase of 18,684 hunter recreation days with a resulting increase of \$2,742,213 to the state economy. Sage grouse nesting and brood habitats would improve while winter habitat would remain in fair to good condition. Of the 297 acres of riparian vegetation, condition class ratings would improve on 89 acres and decline on 7 acres. Of the 73 stream miles presently inhabited by game fish, modest improvements to fish habitat would occur along 45 miles with deterioration along 3 miles. The present wild horse range would be reduced by 67 percent to 148,153 acres capable of

supporting 140 wild horses in the long term. Present livestock use levels would be reduced to 109,575 AUMs (20 percent) in the short term, which would create significant decreases of \$99,731 in annual ranch incomes and \$160,667 in annual incomes to other EIS area economy sectors. By the year 2000, livestock use would increase to 156,630 AUMs (13 percent above present actual use) resulting in favorable increases of \$125,188 to annual ranch incomes and \$201,686 to annual incomes of other EIS area economy sectors.

The initial allocations would require adjustments in the existing use levels of livestock and wild horses. Adjustments in livestock and wild horse use levels would be completed in 3 years and would consist of 27,025 AUMs (20 percent) for livestock and 8,014 AUMs (86 percent) for wild horses.

Allotment management plans (AMPs) would be developed for each allotment in the EIS area. Six allotments on 156,471 acres of public land would continue under intensive management. In addition, intensive management would be developed on 75 allotments (1,299,992 acres). Specific grazing systems and necessary range improvements would be developed during implementation of the Action Proposal. Less intensive management would continue on 58 allotments (61,941 acres).

A minimum rest requirement (a period of no livestock grazing) is proposed for each allotment and would be incorporated into grazing systems during AMP preparation. Progress and effectiveness of the grazing management proposals would be monitored through study programs designed to assess changes in vegetation condition and trend in relation to multiple use management goals.

Implementation of intensive livestock grazing management would require development of 699 water facilities, 212 miles of fence, and 186,310 acres of vegetation manipulation. Range improvements would be developed within 8 years.

ALTERNATIVE B - NO ACTION

The No Action alternative would not change the existing grazing management or the present grazing use levels of vegetation. The present grazing use levels are based on the average active licensed use for livestock (136,600 AUMs), the forage requirements for the 1978 big game wildlife population (64,521 AUMs), and the forage requirements for the current wild horse population (9,364 AUMs).

Intensive management would continue on the six allotments (156,471 acres) presently under intensive management with less intensive management continuing on the remaining 133 allotments (1,352,933 acres). No scheduled rest periods during the present authorized period of use would be implemented on the less intensive management allotments with the present period of use being maintained.

The current wild horse population (625 horses) would continue to utilize the present 443,979 acre wild horse range. The wild horse population would be controlled to maintain a maximum of 625 horses.

No new range improvements would be developed, however, existing range improvements would be maintained in serviceable condition.

ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVE B

Continuation of the present grazing levels for livestock, wild horses, and big game wildlife (especially deer) would result in long term declines in range-land and habitat conditions. Poor condition range-land would increase by 89,476 acres while good and fair condition rangeland would decline by 89,280 and 8,804 acres respectively. Declines in vegetation conditions would lead to a long term increase of 0.8 tons/acre/year in soil displacement, and a 4 percent increase in sediment yields to 2.39 tons/acre/year as a result of increased runoff (0.46 inches/acre during high intensity storms). Declining vegetation conditions would result in a long term decrease of 13,300 AUMs (7 percent) in available forage production, creating a decline in present mule deer populations to 37,769 (12 percent). This would lead to a reduction of 15,826 hunter recreation days with a resulting decrease of \$1,560,659 to the state economy. Sage

grouse nesting and brood habitats would decline in quality while winter habitat would remain in fair to good condition. Condition class ratings for riparian vegetation would decline on 75 acres and improve on 5 acres. This would result in fish habitat degradation along 21 stream miles and improvement along 6 miles. Wild horse populations would have to be controlled in order to maintain the present population. Livestock grazing levels would continue at present levels (136,600 AUMs) through the long term, however, at some point during the long term (before the year 2000), livestock levels may require downward adjustments in response to declining rangeland conditions and forage production.

ALTERNATIVE C - ELIMINATION OF LIVESTOCK GRAZING FROM PUBLIC LANDS

Under this alternative, wildlife and wild horse populations would be allowed to reach a balance with the vegetation resource without the influence of livestock grazing. Existing livestock grazing use on public lands (except livestock trailing on established trails) would be eliminated on all public lands within the White River Resource Area.

All available forage production (183,460 AUMs short term and 192,604 AUMs long term) would be allocated for wildlife and wild horse use and for enhancement of other resources. Existing big game wildlife use of 64,521 AUMs would be allowed to increase to 78,440 AUMs in the long term. Existing wild horse use of 9,364 AUMs would be allowed to increase to 11,250 AUMs in the long term for a maximum of 750 wild horses.

No development of new range improvements or maintenance of existing range improvements would occur except for the benefit of resource values other than livestock grazing. Extensive fencing (approximately 1,200 miles) may be required, at the option of adjacent land owners, if livestock grazing is to continue on private and state lands adjacent to public lands. Implementation of this alternative would be accomplished within 3 years, if selected.

ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVE C

Eliminating livestock grazing use would en-

hance most other uses which occur on public lands. Improvements in vegetation conditions would occur in a relatively short period of time, providing the maximum soil protection in the long term. Rangeland condition would improve on 1,225,000 acres of public land. Rangeland in good condition would increase by 327,000 acres. Soil displacement would decrease by 3.6 tons/acre/year, while a decrease in runoff (0.41 inches/acre during high intensity storms) would result in an 11 percent decrease in sediment yield to 2.12 tons/acre/year. Condition class ratings for riparian vegetation would improve on 251 acres while the remaining 45 acres would be maintained in their present classification. This would result in improvements to fish habitat along 71 stream miles of the 73 miles inhabited by game fish. Big game populations would increase to 53,340 deer (15 percent), 1,926 elk (8 percent), and 224 antelope (2 percent). This would create an increase of 21,251 hunter recreations days, resulting in an increase of \$2,996,335 to the state economy. Deer populations could decrease at some point in time, beyond the long term (year 2000), as a result of declines in preferred winter forage (browse). Sage grouse nesting and brood habitats would improve while winter habitat would remain in fair to good condition. The elimination of livestock grazing from public lands would result in the nonutilization of 98,592 AUMs of available forage which would not be used to the benefit of other resources. Adverse economic impacts would occur to the EIS area economy and livestock industry, especially to the ranching operations dependent upon public land grazing. Ranch incomes would decline by \$432,412 annually, while incomes to other EIS area economy sectors would decrease by \$696,616 annually.

ALTERNATIVE D - OPTIMIZE LIVESTOCK GRAZING

Under this alternative, livestock grazing would be optimized to the level of sustained annual yield of available forage production on public lands suitable for livestock grazing. Big game wildlife and wild horses would be allocated forage not utilized by livestock (noncompetitive) on areas suitable for livestock and all forage available to wildlife and wild horses on areas unsuitable for livestock.

Short term allocations would be 133,647 AUMs for livestock, 42,948 AUMs for big game wildlife, and 760 AUMs for wild horses. Long term allocations would be 180,686 AUMs for livestock, 48,482 for big game wildlife, and 797 AUMs for wild horses.

Wild horses would be managed on 148,153 acres, as under the Action Proposal, but with a reduction of horses down to 52 head.

The livestock grazing management proposals (intensive and less intensive management, utilization levels, minimum rest periods, etc.) would be, under this alternative, as proposed under the Action Proposal. Range improvements proposed under this alternative would be the same as those under the Action Proposal with an additional 14 miles of fence proposed within the wild horse range. Implementation, as in the Action Proposal, would be an 8 year period after approval of the final EIS with adjustments in livestock, wild horse, and big game wildlife use being made by the third year.

ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVE D

Optimization of livestock grazing would provide for the multiple use objectives of most major resource uses except those dealing with wildlife and wild horses. Rangeland conditions would improve on 581,000 acres which would contribute to improved soil and watershed conditions. Soil displacement would decrease by 1.4 tons/acre/year, while a decrease in runoff (0.43 inches/acre during high intensity storms) would result in a 4 percent decrease in sediment yield to 2.30 tons/acre/year. In the long term, the forage allocation for big game wildlife would be reduced to 48,482 AUMs (25 percent below present use). Consequently, population numbers for deer, elk, and antelope would be 36,579 (19 percent), 798 (55 percent), and 103 (53 percent), respectively. This would create a decrease of 20,992 hunter recreation days, with a resulting decrease of \$2,721,214 to the state economy. Sage grouse nesting and brood habitats would improve while winter habitat would remain in fair to good condition. Condition class ratings for riparian vegetation would improve on 89 acres and decline on 19

acres. This would result in modest improvements in game fish habitat along 45 miles and deterioration along 3 miles. The substantial reduction (92 percent) in wild horse numbers that would be required could result in a nonviable wild horse population (52 head). Management of a nonviable population would be in nonconformance with the Wild and Free-Roaming Horses and Burros Act and would require actions by BLM to assure continuation of a viable population. Short term livestock grazing use would decrease to 133,647 AUMs (2 percent below present actual use), however, increases of \$43,825 to annual ranch incomes and \$70,602 to annual incomes of other EIS area economy sectors would occur. Long term livestock use would increase to 180,686 AUMs (25 percent above present use), resulting in increases of \$240,507 to annual ranch incomes and \$387,457 to annual incomes of other EIS area sectors.

ALTERNATIVE E - EMPHASIS ON OTHER RESOURCE USES

Under this alternative, livestock grazing would be managed to optimize or emphasize other resource values such as riparian habitat, sage grouse habitat, watershed and soil protection, wild horses, and big game wildlife.

A larger quantity of forage would be allocated to increased big game wildlife and wild horse populations in the long term than under the Action Proposal. Short term allocations would be 65,319 AUMs for livestock, 64,521 AUMs for big game wildlife, and 4,200 AUMs for wild horses. Long term allocations would be 89,417 AUMs for livestock, 96,815 AUMs for big game wildlife, and 6,750 AUMs for wild horses.

Wild horses would be managed on 148,153 acres with a maximum population of 450 horses.

Existing intensive management would continue on six allotments (156,471 acres of public land) with intensive management proposed on an additional eight allotments (441,589 acres) to improve conditions on critical deer winter range. Less intensive management would continue on 125 allotments (920,344 acres).

Minimum rest requirements proposed under the Action Proposal would be applied each year on the entire allotment under this alternative. A fall minimum rest requirement would also be imposed on 11 allotments to increase available forage to deer on critical winter ranges. Kind of livestock, period of use, and utilization levels of key species would be the same as the Action Proposal.

Range Improvements would be limited to those that would enhance deer, elk, antelope, and sage grouse habitat conditions. Range improvements would include 160 water developments, 172 miles of fence, and 83,890 acres of vegetation manipulations.

Adjustments in grazing use would occur over a 3 year period with implementation of AMPs and range improvements occurring within 8 years.

ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVE E

By optimizing resource uses other than livestock grazing, long term rangeland conditions would improve on 919,438 acres, with good condition range increasing four times the present amount to 324,246 acres. Consequently, soil displacement would decrease by 2.7 tons/acre/year, while a decrease in runoff (0.42 inches/acre during high intensity storms) would result in an 8 percent decrease in sediment yield to 2.19 tons/acre/year. Improved vegetation conditions would allow deer, elk, and antelope populations to increase to 55,835 (23 percent above 1978 populations), 1,926 (8 percent) and 224 (2 percent), respectively. This would create an increase of 27,749 hunter recreation days with a resulting increase of \$3,639,834 to the state economy. Sage grouse nesting and brood habitats would improve while winter habitat would remain in fair to good condition. Condition class ratings would improve on 211 acres while the remaining 86 acres would remain within their present classification. This would result in modest improvements to game fish habitat along 53 stream miles. The size of the wild horse range would be reduced by 67 percent to 148,153 acres, with a 28 percent reduction in wild horse numbers to 450 head. Present livestock grazing levels would be reduced to 65,314 AUMs (48 per-

cent) in the short term, which would create significant decreases in annual income of \$375,146 for ranching operations and \$605,146 for other EIS area economy sectors. By the year 2000, livestock use would increase to 89,414 AUMs but still remain 35 percent below present actual use. This would result in decreases in annual incomes below the present levels by \$272,682 for ranching operations and \$439,291 for other EIS area sectors.

ALTERNATIVE F - OPTIMIZE WILD HORSES

This alternative would propose optimum levels of management for wild horses. Short term allocations of forage would be 104,324 AUMs for livestock, 64,521 AUMs for big game wildlife, and 9,364 AUMs for wild horses. Long term allocations would be 142,352 AUMs for livestock, 71,599 AUMs for big game wildlife, and 16,865 AUMs for wild horses.

Wild horses would continue to be managed on the present wild horse range (443,979 acres) with population levels managed at a minimum of 700 and a maximum of 1,125 head. The wild horse range would be divided into four units with horses, in excess of the minimum number set for each unit, being removed every 5 years.

Intensive grazing management would continue on six allotments (156,471 acres), one of which is within the wild horse range. Intensive management is proposed for 62 allotments (813,606 acres public land) and less intensive management is proposed for 71 allotments (548,327 acres), thirteen of which would occur in the wild horse range.

The range improvements proposed for allotments without wild horses in the Action Proposal are also proposed under this alternative. Range improvements on these allotments would include 521 water developments, 119 miles of fence, and 120,128 acres of vegetation manipulations. Range improvements proposed on wild horse allotments for enhancement of the wild horse habitat include 82 water developments, 19 miles of fence (none in the interior of the wild horse range), and 46,780 acres of vegetation manipulations.

Implementation of this alternative would occur over an 8 year period with livestock use adjustments occurring the first 3 years.

ENVIRONMENTAL CONSEQUENCES OF ALTERNATIVE F

Optimizing wild horses would benefit most other resource uses. Long term rangeland conditions would improve on 426,438 acres with good condition range increasing three times the present amount to 252,676 acres. Consequently, soil displacement would decrease by 1.4 tons/acre/year, while a decrease in runoff (0.43 inches/acre during high intensity storms) would result in a 4 percent decrease in sediment yield to 2.30 tons/acre/year. Improved vegetation conditions would allow deer, elk, and antelope populations to increase to 51,526 (11 percent), 1,926 (8 percent, and 224 (2 percent), respectively. This would create an increase of 18,684 hunter recreation days with a resulting increase of \$2,743,213 to the state economy. Sage grouse nesting and brood habitats would improve while winter range habitat would remain in fair to good condition. Condition class ratings for riparian vegetation would improve on 89 acres and decline on 7 acres. This would result in modest improvements to game fish habitat along 45 stream miles and deterioration along 3 stream miles. By allowing increased forage for wild horses, population numbers would increase to 1,125 head (80 percent above the present population) on the present wild horse range (443,979 acres). Livestock use would be reduced on the wild horse range to provide for the additional wild horse forage. Present livestock grazing levels would be reduced to 104,324 AUMs (24 percent) in the short term, which would create significant decreases of \$123,198 to annual ranch incomes and \$198,472 to annual incomes of other EIS area economy sectors. By the year 2000, livestock use would increase to 142,352 AUMs (4 percent above present actual use), resulting in favorable increases of \$75,956 to annual ranch incomes and \$122,333 to annual incomes of other EIS area economy sectors.

THE PREFERRED ALTERNATIVE

The six alternatives will be discussed according to their ability to conform to the multiple use objectives determined through land use planning, as mandated by the Federal Land Policy and Manage-

ment Act of 1976 (FLPMA). The alternative that least agrees with these objectives will be discussed first, followed by the other alternatives in increasing order of conformance. The alternative that best accommodates the multiple use objectives would be the preferred alternative or preferred grazing management program, discussed last.

The multiple use objectives of the land use plan are to enhance soil and watershed protection through improvement in the vegetation resource, improve rangeland conditions, provide quality habitat for wildlife and wild horses, provide a continuous supply of livestock forage, reduce soil erosion and sediment damage, and improve water quality.

No Action (Alternative B)

A continuation of present grazing management would not meet most multiple use objectives since most major resource values would decline over the long term. Continuation of the present grazing levels for livestock, wild horses, and big game wildlife, especially deer, would result in long term declines in rangeland and habitat conditions. Declines in vegetation conditions would lead to long term increases in soil displacement and increased sediment yields as a result of increased runoff, especially during high intensity storms. Big game wildlife populations and carrying capacities would fluctuate, however, the trend would probably be a long term decline, especially for deer, resulting from a decline in habitat conditions. Present wild horse numbers are in excess of the levels identified through land use planning and would continue to increase, if not controlled. Livestock grazing levels would continue at present levels through the long term, however, at some point during the long term (before the year 2000), livestock levels may require downward adjustments in response to declining rangeland conditions and production.

Elimination of Livestock Grazing from Public Land (Alternative C)

Eliminating livestock grazing use would enhance most other resource uses on public lands. Dramatic improvements in vegetation conditions would occur in a relatively short period of time, providing the maximum soil protection in the long term. Decreases in runoff and sediment yield would

be maximized. Water quality changes in most major watersheds would improve, but not a significant improvement above the present quality. Significant improvements in the conditions of riparian zones and aquatic habitats would occur. Big game populations would increase to desired levels, except for deer populations. Deer populations would increase but would be limited by improvements in production of preferred winter forage (browse) on winter ranges. Deer populations could decrease at some point in time, beyond the long term (year 2000), as a result of long term declines in the availability of preferred winter forage. The loss of livestock grazing from public lands would result in the loss of a renewable resource; that portion of the vegetation resource not utilized by other users that could be utilized by livestock. Adverse economic impacts would occur to the EIS area economy and livestock industry, especially to the ranching operations dependent upon public land grazing.

Optimize Livestock Grazing (Alternative D)

Optimization of livestock grazing on public lands would provide for the multiple use objectives of most major resource uses except those dealing with wildlife and wild horses. This alternative would result in improved rangeland conditions, which would contribute to improved soil and watershed conditions. Riparian and aquatic habitats would show slow improvement. The major disadvantages under this alternative would be the significant reductions in wildlife and wild horses required to optimize livestock use. The amount of forage that would be provided to big game wildlife would create long term populations declines for deer (19 percent), elk (55 percent), and antelope (53 percent). The substantial reduction in wild horse numbers that would be required could result in a nonviable wild horse population. Management of a nonviable population would be in nonconformance with the Wild and Free Roaming Horses and Burros Act and would require actions by BLM to assure continuation of a viable population. Long term livestock grazing use would increase by 25 percent, which would result in favorable economic impacts to the livestock industry and economy of the EIS area.

Emphasis on Other Resource Uses (Alternative E)

Optimization of wildlife, watershed, and recreation values would enhance most resource values and uses. Emphasis on resource uses other than livestock grazing would result in improved rangeland conditions, which would contribute to improved soil and watershed conditions. Deer, elk, and antelope populations could increase by 23, 8, and 2 percent respectively. Sage grouse habitat conditions would improve. Aquatic and riparian habitat would exhibit significant improvements. Although the wild horse range would be reduced, populations would increase on the remaining horse range. Recreation opportunities associated with big game hunting would improve. Present livestock grazing levels would be reduced 48 percent in the short term and 35 percent in the long term. An associated decline in ranch incomes would occur, causing significant economic losses to the livestock industry and other economy sectors in the EIS area.

Optimize Wild Horses (Alternative F)

As with Alternatives A and E, most resource values and uses would be enhanced with the optimization of wild horses. Improved rangeland conditions would occur, which would contribute to improved soil and watershed conditions. Deer, elk, and antelope populations would increase by 11, 8, and 2 percent respectively. Habitat conditions for sage grouse would improve, along with modest improvements in aquatic and riparian habitat conditions. By allowing increased forage for wild horses, population numbers would increase on the present horse range. Livestock use would be reduced on the horse range to provide increased forage for wild horses. Total livestock use proposed under this alternative would result in a short term reduction of present levels by 24 percent, however, long term use would increase 4 percent above present levels by the year 2000. Long term ranch incomes and incomes to other sectors of the EIS area economy would increase after short term decreases.

Action Proposal (Alternative A)

The Action Proposal would most comprehensively meet all the multiple use objectives outlined in the White River Resource Area land use plan. This alternative would allow for improved rangeland

conditions, which would result in improved soil and watershed conditions. Deer, elk, and antelope populations could increase by 11, 8, and 2 percent respectively. Habitat conditions for sage grouse would improve, along with modest improvements in aquatic and riparian habitat conditions. The wild horse population and range would be reduced considerably, however, improved habitat conditions would benefit the remaining horses. Present livestock use levels would be reduced by 20 percent in the short term, which would create significant decreases in ranch incomes. By the year 2000, livestock use would exceed present levels by 13 percent with favorable increases in ranch incomes and incomes to other economy sectors in the EIS area.

The Action Proposal (Alternative A) would provide improvement in, and enhancement of, major resource values and competing land uses, while at the same time, providing for the least economic disruption. Rangeland conditions would be improved providing increased soil and watershed protection and increased forage production. Improvements in aquatic and riparian habitats would occur. The Action Proposal would continue to provide space and forage for a viable wild horse herd and provide increased forage supplies for big game wildlife species. Short term economic losses resulting from reduced livestock grazing levels would occur, however, long term increases in livestock grazing use would create economic gains above the present levels. Based upon the analysis of the alternatives, the Action Proposal would be the preferred alternative.

SIGNIFICANT ISSUES TO BE RESOLVED

Many comments received from review of the Draft Environmental Impact Statement (DEIS) questioned, or raised concern over some management recommendations made in the land use plan for the White River Resource Area. The significant issues raised during review of the DEIS will be given consideration in the management decisions, yet to be made, for livestock grazing management in the White River Resource Area (WRRRA).

Vegetation Allocation

Livestock interests were concerned over taking reductions in livestock use while wildlife populations

were maintained at 1978 levels. The Bureau's primary responsibility is to improve or maintain an acceptable rangeland condition and to adjust vegetation uses to a sustained yield of that vegetation.

The Federal Land Policy and Management Act of 1976 requires that uses on public lands be allocated through land use planning. Management recommendations developed through land use planning, on which this EIS is based, recommend that existing wildlife populations in the White River Resource Area be maintained by providing their required forage and habitat needs. Also, the land use plan recommends establishing studies that would determine the capacity of available winter ranges for deer and elk and maintaining deer and elk populations at existing levels until such studies are complete.

Livestock grazing reductions were a major area of controversy in public responses to the DEIS. Livestock interests were concerned over the use of old survey and drought year data as a basis upon which to make livestock reductions. The BLM recognized the shortcomings of these data but this was the best and most current data available at the time. This data will be adjusted through on-the-ground studies and consideration of needs of all resources.

Spring Rest

Three differing points of view have been expressed concerning proposed spring rest from livestock grazing. Wildlife interests feel that spring rest provisions on deer winter ranges could effect long term decreases in browse production, thus reducing deer carrying capacities. Livestock interests are concerned that spring rest from livestock grazing would exert economic hardships on individual ranching operations. BLM maintains that spring rest is essential to improve vegetation condition and trend, watershed condition, and habitat conditions for small and nongame wildlife. The preferred alternative proposed to install flexible spring rest provisions which would vary among allotments, in response to prevailing rangeland condition, wildlife habitat values, soil erosion susceptibility, etc. Spring rest requirements would change through time as trends in vegetative, habitat and watershed conditions were identified through long term monitoring studies.

Riparian and Aquatic Habitats

Concern has been expressed that the Action Proposal (Alternative A) would not provide the level of improvement to riparian vegetation which would be necessary for quality wildlife and fisheries habitat, with the exception of certain streams containing State listed threatened fish species. The analysis of this alternative does indicate, however, that some slight improvement would occur. In order to insure that these riparian areas continue to improve as expected, recommendations in the land use plan provide for monitoring these areas and for mitigation on a case by case basis for those areas not responding to improved livestock grazing management.

Wild Horses

Public responses indicated concern regarding proposals in the land use plan for managing wild horses. Major areas of interest included: 1) the need for reducing the size of the wild horse range; 2) the proposed population levels; and 3) the possibility of the proposals violating the mandates of the Wild and Free-Roaming Horse and Burro Act. The two primary factors which were considered in the proposed reduction in range size were: 1) the amount of habitat lost from increased oil and gas production and human disturbance, and 2) the areas where horse movements are restricted by existing fences creating competition between horses and deer for winter range. The remaining wild horse range, considered to be their preferred habitat, has been allocated for continued wild horse use.

Vegetation Manipulations

Wildlife interests have expressed concern over potentially adverse impacts to mule deer and sage grouse habitats from the proposed vegetation manipulations in the action proposal. The WRRRA's Land Use Plan and this EIS have identified the specific mitigation measures and design restrictions which would provide for the protection of habitat values for deer, sage grouse and the other wildlife species. Briefly, wildlife habitat values would be protected through the mitigations developed through both the land use plan and EIS process, site-specific analysis and environmental assessment procedures, coordination with local resource agencies, and monitoring studies.

SECTION 6
CONSULTATION AND COORDINATION
IN THE REVIEW OF THE DRAFT EIS

List of Comment Letters



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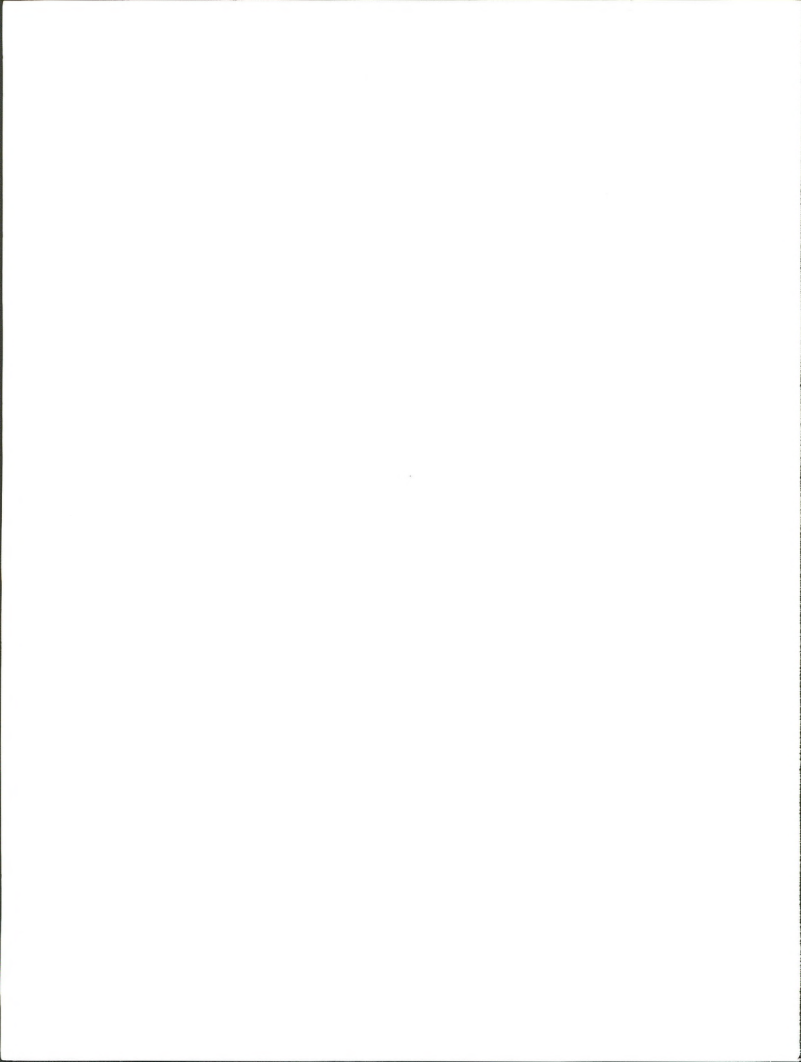
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TESTIMONY

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* No response required



Comment Letters and Responses

COMMENT LETTER 1

Advisory
Council On
Historic
Preservation

1322 K Street, NW
Washington, DC 20005

Lake Plaza South, Suite 636
44 Cross Boulevard
Lakeview, CO 80228

June 11, 1980

Mr. B. Curtis Smith
Area Manager
Bureau of Land Management
P. O. Box 908
Nevada, Colorado 80641

Dear Mr. Smith:

The Council has reviewed your draft environmental statement (DES) for the proposed White River Resource Area Grazing Management Program circulated for comment pursuant to Section 102(2)(c) of the National Environmental Policy Act. We note that the undertaking may affect the following identified cultural features: Carrut Mesa Pictograph Site, Canyon Pintado Historic District, Dark Creek Pick-Up Village, and the Present Lookout Fortification Site, as well as nine other sites nominated for and approximately sixty sites determined eligible for inclusion in the National Register of Historic Places, and a great number of cultural properties that may exist in the area but have yet to be identified.

It is noted that no reference was made to the Programmatic Memorandum of Agreement of January 1980 between the Bureau of Land Management (BLM), the National Conference of State Historic Preservation Officers, and the Council regarding the Livestock Grazing and Range Improvement Program. A copy has been enclosed for your convenience. According to Stipulation 1 of this document, BLM is required to complete one of the following three conditions: (1) To conduct Class 1 and Class II inventories of cultural resources, which are to be completed at an appropriate planning stage and prior to the preparation of the DES in accordance with BLM manual Section 8111; (2) To undertake an alternative to the inventory procedure with the State Historic Preservation Officer's (SHPO) consent during the interim years of 1979-1981; or (3) To request the comments of the Council pursuant to 36 CFR Part 800 of the Council's regulations, if an acceptable alternative cannot be negotiated with the SHPO. Evidence of the failure to agree with the SHPO on an alternative procedure should be forwarded to the Council with a request for Council comment on the specific determination of effect with appropriate supporting documentation in accordance with 36 CFR Section 800.6.

Circulation of a DES, however, does not fulfill your agency's responsibilities under Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. Sec. 470f, as amended, 90 Stat. 1300).

Prior to the approval of the expenditure of any Federal funds or prior to the granting of any license, permit, or other approval for an undertaking,

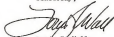
COMMENT LETTER 1

Page 2

Mr. B. Curtis Smith
White River Resource Grazing Management Plan
June 11, 1980

Federal agencies must afford the Council an opportunity to comment on the effect of the undertaking on properties included in or eligible for inclusion in the National Register in accordance with the Council's regulations (copy enclosed). Until these requirements are met, the Council considers the DES incomplete in its treatment of historical, archaeological, architectural, and cultural resources. You should obtain the Council's substantive comments through the process outlined in 36 CFR Section 800.9. These comments should then be incorporated into any subsequent documents prepared to meet requirements under the National Environmental Policy Act. Mr. Marjorie Eagle may be contacted at (303) 238-4966, an FTS number, for further assistance.

Sincerely,



Louis S. Wall
Chief, Western Division
of Project Review

Enclosures

RESPONSE TO COMMENT LETTER 1

Response to Comment Letter 1

Advisory Council on Historic Preservation

A. The Programmatic Memorandum of Agreement of January 1980 was referenced on page 10 of the DEIS under "Standard Design, Construction, and Operation Procedures". The bibliographic reference is on page 234. A letter of consultation was sent to the SHPO on 8/8/79 and his reply reviewing the draft (dated 5/21/80) states that "... Cultural resources have been dealt with in the Programmatic Memorandum of Agreement.... therefore, no further comment is necessary."

B. The Council was afforded an opportunity to comment on the DEIS through the process outlined in 36 CFR Section 800.17:

"... Preparation of a draft environmental impact statement may fulfill the requirements for reports and documentation under these authorities.

Circulation of the statement for comment pursuant to Section 102(2)(C) of NEPA shall constitute a request for Council comments under Section 800.4 of these regulations if Federal agencies so request in cover letters circulated with draft environmental impact statements..."

A cover letter accompanied the DEIS requesting written comments and oral testimony on the document. The letter also stated that "those comments that pertain to the adequacy of the impact assessment, or present new data, will be addressed in the Final EIS."

COMMENT LETTER 2

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
Risky Mountain Region
11177 West Eighth Avenue, Box 25127
Lakewood, Colorado 80225

1980-3

MAY 11 1980



District Manager, BLN
Craig District Office
P. O. Box 248
455 Emerson Street
Craig, Colorado 81625

Gentlemen:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the proposed White River Resource Area Grazing Management Program. We have the following comments:

1. The abstract states the proposed action would reduce wild horse numbers to 90; on page vi, this number appears to be 140.
2. The abstract states local income would decrease by \$260,398. This figure needs to be related to a time span (annually, or over a period of 3 years).
3. Page 9 - No mention is made of monitoring conditions on the 62,000 acres (58 allotments) that will not be intensively managed. Since condition and trend have a greater chance of going downward on these lands, shouldn't they be monitored?
4. Page 63 - Caption of the lower photograph should be reworded.
5. Page 67 - The status of the 13 threatened and endangered plants should be clarified, for none of the plants are officially designated as endangered or threatened by either the Federal or State government (See comment #12).
6. Page 125 (#10 Assumption) - Wording has connotation that OOW is not now properly managing wildlife populations. Suggest deleting the word "properly."
7. Page 134 (Column 1, last sentence) - "greater than 30 to 50 percent" should be rewritten.
8. Page 147 - Change "marginal" to "modest."

5010-11-10

COMMENT LETTER 2

2.

9. Page 149 (Column 1, paragraph 2) - If aquatic habitat in Divide Creek Reservoir was improved by fencing out livestock, it would appear that the same should be planned for West and Bitter Creek Reservoirs.

10. Page 169 (Column 2, paragraph 1) - If West and Bitter Creek Reservoirs continue to settle top sediment from upstream livestock-caused erosion, the conclusion that no dramatic change would occur by the year 2000 is unreasonable. The reservoirs could be filled with sediment! Why not plan to eliminate the damage to streambanks and riparian vegetation above these reservoirs?

11. Page 309 (Table E-2) - The riparian area on public land portions of Brush Creek is relatively large (7.3 acres) and there are 3.0 miles of stream containing cutthroat trout. The DEIS states that the riparian habitat is in a fair-declining condition and will continue to decline under the Action Proposal (preferred alternative). In an area supporting so few streams with trout habitat, why does the Action Proposal sacrifice this stream? Table E-2 also indicates there is no data available concerning this area - not even the species composition of the riparian vegetation.

12. Page 317 (Table E-8) - Reader will assume from this table that there are 13 I/E plants on the EIS area. None of these plants have been officially designated as either threatened or endangered. Suggest the title of this table, and the narrative on page 67, clarify the status of plants. Also, the Action Proposal should consider special management for Raven Ridge and Cathedral Bluffs to protect the several sensitive species dependent upon those areas.

Sincerely,

Craig W. Rupp
for CRAIG W. RUPP
Regional Forester

RESPONSE TO COMMENT LETTER 2

Response to Comment Letter 2

United States Forest Service

1. The initial allocation in the short term would provide 1,350 ADNs for 90 horses. However, the long term allocation would provide 2,101 ADNs for 140 horses as noted on page vi (DEIS).
2. All income changes noted are on an annual basis. The summary has been changed accordingly.
3. Text change has been made to include monitoring on less intensive allotments.
4. See Errata for DEIS, page 63.
5. See Errata for DEIS, page 67.
6. See Errata for DEIS, page 125.
7. See Errata for DEIS, page 136.
8. See Errata for DEIS, page 147.
9. It is a well documented fact that the fencing of riparian zones to exclude livestock will greatly improve conditions in these areas. It would be desirable to fence all streams and reservoirs within the EIS area, however, it would not be economically feasible. During the development of the Management Framework Plan (MFP) for this Resource Area, the reservoirs and streams in both Must and Bitter Creeks were eliminated from consideration for immediate fencing. The streams selected for fencing were those in which an "area of critical environmental concern" was identified (i.e., Lake and Soldier Creeks which are inhabited by almost pure strains of Colorado cutthroat trout populations). However, this decision would not prevent a reevaluation of these two reservoirs or their associated streams at a later date. Under "Assumptions and Analysis Guidelines" (DEIS, page 125), Item 8 states that "BIA would verify the level of impacts and monitor the Allotment Management Plans (AMPs) for the purpose of making necessary adjustments in those plans which are not meeting the desired multiple use objectives". This would complement the Step 11 multiple use reevaluation (NF 1.1 of the WMA MFP) that "the fencing of other riparian zones in the WMA will be evaluated on a case by case basis and determinations made according to the problems present". It is possible that these reservoirs and their associated streams would be fenced at a later date if deemed necessary.

RESPONSE TO COMMENT LETTER 2

10. Page 166 (column 2, paragraph 1) has been reworded to reflect the possibility that the reservoirs on West and Bitter Creeks could fill with sediment by the year 2000 as a result of continuation of present grazing management. Under this alternative (No Action) there is no plan to eliminate the damage to streambanks and riparian vegetation above these reservoirs, and, therefore, it is not addressed here. Alternative C (DEIS, page 179) does, however, address such a plan and the associated improvements.

11. As in the case with all EISs, a proposal (alternative) in written and the impacts of such a proposal are then assessed. In the case of Brush Creek, it was certainly not the intention of the Action Proposal to "sacrifice this stream" or any other stream. In the course of assessing the impacts resulting from this alternative, however, it was determined that those range improvements designated for the Brush Creek watershed would not be sufficient to abate the declining riparian trend. As in the case of West and Bitter Creeks (Item 9, above) this declining trend would not be allowed to continue once the ADP for this allotment was implemented. If monitoring and studies indicated that this assessment of continued decline in the riparian zone was true, then actions such as fencing or modification of the ADP would certainly follow.

The elimination of the species composition data for Brush Creek in Table E-7 (DEIS, pages 309, 310) appears to be a typographical error (see Errata for DEIS, page 309).

12. See Errata for DEIS, pages 137, 148, 200, 316, and 317 for clarification on status of sensitive plants.

Little data is known, at the present, about the habitat requirements for the sensitive plant species in the EIS area. Additional data will be collected on their habitat requirements and extent which will be considered in the site specific environmental assessment of the grazing systems and range improvements to be developed (DEIS, page 10).

COMMENT LETTER 3

UNITED STATES DEPARTMENT OF AGRICULTURE

SOIL CONSERVATION SERVICE

P.O. Box 17107, Denver, CO 80217

April 30, 1980

Gale Andrus
State Director
Bureau of Land Management
Room 700
Colorado State Bank Bldg
1600 Broadway
Denver, CO 80202

Dear Mr. Andrus:

We have reviewed the Draft Environmental Impact Statement for the White River Resource Area Management Plan.

The BLM should be complimented for an excellent action plan and a quality EIS that fairly states the environmental impacts of logical alternatives.

We are completely in accord with the proposed management techniques stated in the EIS and agree that this course of action will result in long term benefits to the land and related resources.

Thank you for the opportunity to comment.

Sincerely,

Sheldon G. Boone
Sheldon G. Boone

State Conservationist

cc: Norman Berg, Administrator, SCS, Washington D.C.
Director, Environmental Services Division, SCS, Washington D.C.
Kenneth L. Williams, Director, WSR, SCS, Portland, Oregon
Office of Environmental Review, EPA, Washington D.C.



COMMENT LETTER 4

UNITED STATES GOVERNMENT

Memorandum

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

IN REPLY REFER TO:

1/82
U-820

TO : District Manager, Craig

Date: June 16, 1980

FROM : District Manager, Vernal

SUBJECT: Draft Environmental Impact Statement for White River Resource Area Grazing Management Program

The Vernal District feels that there is a significant deficiency in the White River Grazing DEIS. The DEIS fails to address the fact that there are seven allotments along the Utah-Colorado border that are jointly managed by the Vernal District (Utah) of BLM and the Craig District (Colorado) of BLM.

The Craig District manages the following two allotments which extend into Utah:

- 6307 K Ranch Allotment - 4363 acres in Utah with estimated carrying capacity of 238 AUM's.
- 6357 Evacuation Creek (Davis Canyon) Allotment - 5075 acres in Utah with estimated carrying capacity of 334 AUM's.

Since the Craig District, White River Resource Area has management responsibility for grazing on these lands in Utah, we feel that these lands should also be addressed in the White River Grazing EIS.

The Vernal District manages the following five allotments which extend into Colorado:

- 6358 Bitter Creek Allotment - 8148 acres in Colorado with an estimated carrying capacity of 1374 AUM's.
- 6363 Park Canyon Allotment - 7295 acres in Colorado with an estimated carrying capacity of 1068 AUM's.
- 6344 Weaver Draw Allotment - 1095 acres in Colorado with an estimated carrying capacity of 66 AUM's.
- 6311 Stateline Allotment - 3310 acres in Colorado with an estimated carrying capacity of 425 AUM's.
- 6310 Bonanza Allotment - 1649 acres in Colorado with an estimated carrying capacity of 122 AUM's.

Grazing on these lands is managed by the Vernal District and we therefore feel that these allotments should be dropped from the White River Grazing EIS. We propose that these allotments be included in the Bookcliffs Grazing (RWP) EIS scheduled to be completed in 1984.

DOC-1041-0
MAY 1980

COMMENT LETTER 4

The grazing management responsibilities described above have been in effect since 1975 by Interdistrict Agreement signed by both District Managers and State Directors. The Three Corners Grazing EIS (Utah) omitted an allotment (Brown's Park) in Utah which was managed by the Craig District and included an allotment (Diamond Mountain) in Colorado which was managed by the Vernal District. We feel that the precedent established in the Three Corners Grazing EIS and the existing management responsibilities agreed upon by Interdistrict Agreement would make for a more workable Grazing EIS than the present White River Grazing DEIS which splits seven existing allotments along an arbitrary line (Utah-Colorado State Line) and does not reflect existing management practices. We, therefore, recommend that the final EIS for the White River Grazing Program follow allotment boundaries rather than splitting existing allotments. The K Ranch and Evacuation Creek Allotments should include those areas in Utah in addition to the Colorado portions and those portions of the Bitter Creek, Park Canyon, Weaver Draw, Stateline, Bonanza Allotments in Colorado should be dropped from the White River Grazing EIS.

L.H. Ingman

cc: U-921

RESPONSE TO COMMENT LETTER 4

Response to Comment Letter 4

Bureau of Land Management - Utah

- A. Early in the development of the White River Grazing EIS, instructions were given to include only those areas occurring within the legal boundaries of the White River Resource Area. This is why the allotments in question are presented as they are.

The increase in acres and ADUs contributed by the two allotments administered by the Craig District, however, have been added in the Errata section for page 6 and text changes have been made in the Final EIS. It is recognized that the five allotments administered by Utah will be covered in the Bookcliffs RMP (EIS) in 1986 but are not excluded from the Final White River Grazing EIS. Dropping these five allotments from the EIS would have no significant effect on overall assessment results but would require extensive, time consuming, revision of tabulations throughout the EIS.



COMMENT LETTER 5

United States Department of the Interior

FISH AND WILDLIFE SERVICE
AREA OFFICE, COLORADO-UTAH
1311 FEDERAL BUILDING
121 SOUTH STATE STREET
SALT LAKE CITY, UTAH 84138

IN REPLY REFER TO: (E5)

June 12, 1980

MEMORANDUM

TO: District Manager, Bureau of Land Management
Craig District Office
P.O. Box 240
Craig, Colorado 81625

FROM: Robert H. Shields, Area Manager
U.S. Fish and Wildlife Service
Salt Lake City, Utah 84138

SUBJECT: Review Comments White River Resource Area Grazing Management
Draft Environmental Impact Statement

We have reviewed the draft White River Resource Area Grazing Environmental Impact Statement and offer the following comments and recommendations.

General Comments

Mule Deer

The Piceance Basin mule deer herd is recognized as the largest mule deer herd in North America (page 67, paragraph 9) and is a tremendous natural resource for the people of Colorado. Public lands provide 75-80 percent of this herd's winter and critical winter range needs (page 67, paragraph 10) which, in nearly all cases, is the limiting factor keeping a deer population from increasing ad infinitum.

These traditional winter ranges have evolved over time because of their ability to serve the food and cover needs of deer. Winter ranges must remain healthy and productive if a deer herd is to remain healthy and productive over time.

To determine independently how we believe the Piceance deer herd would fare under the proposed grazing proposal, six critical deer winter areas were located generally by Township(s) on Map 3-5, Mule Deer Distribution, Habitat Conditions and Seasonal, and then a determination was made on what allotments they were in from the supplemental maps. We then compared best known management practices for deer winter range management with the proposed grazing management regimes for these allotments. Grazing use and rest periods were taken from Table B-1, Proposed Allocation and Grazing Management Alternative A - Action Proposal for comparison with recognized best practices deer winter range management recommendations. We summarized parts of Table B-1 in the accompanying table which shows public land ownership vs. other land ownerships, vegetative rest and use periods, and short term and long term forage allocations to deer and livestock (Table 1). No other wildlife species were considered in this analysis because of the high importance of this deer herd to the State of Colorado.

COMMENT LETTER 5

Page 2

This comparative analysis led us to conclude that the best grazing management program for winter deer range was not being proposed for the following reasons: (1) livestock and deer would compete for available forage; (2) livestock grazing rest periods do not follow deer winter range management recommendations found in the reference literature such of which was cited in the environmental statement, and (3) proposed long term forage allocations for livestock is proportionally greater than for deer.

A Livestock grazing would be allowed on all the allotments with extensive critical deer winter range from May or June through mid December or later. This period coincides with the lessening palatability of curing grasses and the increasing palatability of the new shrub growth to livestock. This would result in heavy livestock use of the growing winter deer browse. Continued livestock use of shrub forage would continue into winter as other available forage is used. This type of livestock use would decrease the amount of forage deer would have for their winter needs.

B Livestock grazing rest periods on all the allotments having extensive critical deer winter range is proposed for mid March through late June. Recommendations made for best deer winter range management from studies made by Jensen, et. al. (1979), Smith et. al. (1979) and others recommend grazing livestock on deer winter range from spring greenup until July 1. This timing reduces grass competition with forbs and shrubs, reserves new browse growth for deer and removes cured grass cover so fall grass greenup would be more readily available for deer. Smith, et. al. (1979) found sheep and deer timely pastured could increase animal production per unit of land under dual grazing. Their recommended livestock - wildlife grazing programs for deer winter ranges promises better multiple use outputs than your single purpose action proposal.

C Forage allocations during implementations of the proposed action (short term) allows about a 50-50 forage allocation between deer and livestock on the selected allotments with critical deer winter ranges. Upon full implementation (long term) livestock allocations would be increased to 54 percent of the forage while deer would receive only 46 percent.

D The Fish and Wildlife Service recommends the Bureau of Land Management reconsider range management alternatives for prime deer winter ranges in the White River Resource Area. None of the proposed alternatives follow recommendations for best management practices on deer winter ranges for livestock-deer use. We recommend livestock grazing be permitted from spring greenup to July 1. We believe this would improve the quantity and quality of the deer winter forage, reduce livestock-deer competition, and increase total animal use per unit area.

COMMENT LETTER 5

Page 3

Riparian and Aquatic Habitats

Nothing of consequence is proposed under the selected alternative to protect or improve riparian or aquatic habitats except fencing Trappers Lake and Soldier Creek to protect Colorado River cutthroat habitat. Studies on various rest-rotation schemes have failed to show significant improvements in riparian or aquatic habitats. To date only total exclusion of livestock has proven effective in restoring aquatic habitats to productive game fish waters and even then short term trespass was found to negate four years improvement (Duff, 1977).

E According to a report, Survey of riparian and aquatic communities and collection of water flow data within the Piceance Basin wildlife habitat area and portions of the White River and Roan Creek Drainage (Colorado Division of Wildlife, 1977), funded by BLM with Sikes Act money, found all riparian habitats to be in poor or fair condition and that many had potential for improved aquatic habitat. Riparian habitat trunks were found to be stable or declining and none improving. Fish and water oriented wildlife could be enhanced by following recommended actions in the report.

The preferred alternative does not comply with BLM's Wetland-Riparian Area Protection and Management Guidelines implementing Executive Order 11950 (Federal Register, Vol. 43, No. 25, 7889-7895). These guidelines are intended to improve protection and management of wetlands and riparian areas on BLM administered lands.

The FWS recommends management plans for riparian and aquatic habitats be amended and implement a monitoring system to assure improvement in these important habitats in accordance with various laws, directives, and guidelines.

Sage Grouse

F An examination of all proposed sagebrush control programs should be preceded by an intensive sage grouse use survey. Guidelines for management of sage grouse habitat should follow those formulated by Call (1979) and/or Braun, Britt and Walstead (1977).

Specific Comments

E Page v, paragraph 5, states, "...and 241,000 acres of sage grouse habitat would be designated for improvement through improved livestock grazing management." This statement is not supported in the text nor is there documented evidence that this can be done under the proposed action. What documentation do you have to support this statement? There is no quantification of sage grouse habitat in the resource area (page 72). How much sage grouse habitat is there in the resource area? How did you arrive at a figure of 241,000 acres of sage grouse habitat that would be improved?

COMMENT LETTER 5

Page 4

Page 27, paragraph 12 continuing on page 31 states, "...and sage grouse would be considered in all treatments." What guidelines would be followed to protect and improve sage grouse habitat? Nothing is referenced nor is anything proposed in Appendix A, page 232-233 on sagebrush/mountain brush treatment methods that provide protection for sage grouse habitat.

Page 144, Environmental Consequences on Sage Grouse. The conclusions drawn in this section cannot be supported and considerable revision is needed. Conclusions on the impacts must be supported by some recognized sage grouse habitat management guidelines. If they are to be valid. Other points that need to be answered are: How would sage grouse habitat be improved if there is a lack of specific information on seasonal movements and activity use areas (page 144, paragraph 4 under Impacts on Sage Grouse)? How can winter, nesting and breeding habitat be improved if it is not provided for on each treated site (page 144, paragraph 4 under Impacts on Sage Grouse)? What evidence exists to support the statement, "...where winter range overlaps brood range, small created openings could benefit brood range..." (page 144, paragraph 4 under Impacts on sage grouse)? Paragraph 5, page 144 implies the kill of sagebrush can be controlled to give a predetermined percent sage brush stand. What evidence is there to support this?

Paragraph 6 under Impacts on Sage Grouse is based on "ifs." How will sage grouse habitat be affected under the proposal? How would the percent kill of sagebrush be controlled? Would it be based on averages, a total kill in one block area and other black stands left untreated in others? If so, what guarantees the untreated stands have sage grouse habitat values?

In conclusion, we know of little from the literature or from experience that supports your conclusions of the impacts of the proposed action on sage grouse and recommend a total revision.

Page 1, Section 1, Purpose and Need for the Action. This section should include Executive Order 11990 which provides for the protection and improvement of riparian and wetlands habitats. (See BLM guidelines, Federal Register Vol. 45, No. 25, 7889-7895).

Page 4, Table 2-1, under MFP 11, Multiple use recommendations across from 48. We recommend adding, providing a ground level water source for small mammals and pre-fledged birds (i.e. sage grouse chicks). See our comments on Water Developments.

Page 35, paragraph 4 states, "Aquatic life, in general, would be enhanced through the long term on all 78 perennial streams..." This comment cannot be supported under Alternative A. See our general comments on riparian and aquatic habitat.

Page 35, Recreation. If aquatic habitat would be improved (page 35, Aquatic Wildlife) why wouldn't fishing recreation be increased? If sage grouse habitats and populations would be improved (page 35, Wildlife) why wouldn't bird hunting recreation be increased?

COMMENT LETTER 5

Page 5

Page 30, Action Proposal (Alternative A) your statement, "Habitat conditions for sage grouse would improve, along with aquatic and riparian habitats conditions..." needs revising. The proposed action (Alternative A) does not propose actions to cause this to happen (see previous comments).

Page 134, Impacts on Riparian Vegetation. Research on livestock - riparian habitat relationships does not support improved conditions unless grazing is excluded or nearly so. In the local western vernacular, it's often said, "Cows will stand on water and starve to death unless you move them out every day." We recommend you reconsider a new riparian management program or reanalyze the proposed action's impacts.

Page 135, Table 4-5. Predicting improved riparian vegetation cannot be supported by the proposed action (see previous comments).

Page 147, Impacts on Aquatic Wildlife and Impacts on Fish. These improvements cannot occur under the proposed action Buff (1977), Armour (1977) Kibala and Savage (1977) and others. The first paragraph under Impacts on Aquatic Wildlife is contradicted by the last three paragraphs in the same section.

Page 231, Appendix A, Water Developments. The FWS supports livestock - wildlife water developments but recommends ground level water sources be provided at all tanks and troughs for pre-fledged birds (sage grouse chicks) and small mammals. We also recommend that when springs or seeps are improved and collected for piping off site, some water should be left available at the spring or seep for those wildlife populations depending on it.

Endangered Species

We noted in the draft that livestock grazing may affect threatened and endangered plants. We also noted a 45 reduction of water flows in the White River because of improved soil and vegetative conditions but yet no mention of this impact to the endangered fishes is made in the draft. In light of these statements in the draft, we request that you either clearly demonstrate that no impacts on these threatened or endangered species or request Section 7 Consultation.

We thank you for this opportunity to review and comment on your draft environmental statement.

Jim Fiedler ACQUIS

RESPONSE TO COMMENT LETTER 5

Response to Comment Letter 5

United States Fish and Wildlife Service

- A. As described in the DEIS, Appendix C (pages 279-287), forage competition between mule deer and livestock was reduced to the extent possible, based on information available at that time, through the allocation process. All competitive forage was allocated to big game.

It is evident, in comparing Maps 3-6 and 3-14, that critical winter ranges are not proposed to be grazed continuously by livestock throughout the grazing season (from May through December or later) (DEIS, page 9). Livestock would move out of these low elevation critical winter ranges in mid to late spring, to higher elevations, in response to plant phenological development and water availability. Thus, livestock use on critical winter ranges would occur only during the spring, fall, and winter periods. On these allotments, spring use would be significantly greater than late season use because the majority of livestock are taken off public lands in the fall and wintered on private meadows and fed hay.

The most important factor to consider is that grazing systems proposed as a part of AMF development would be subject to site specific environmental assessments (SEAs) prior to Implementation (DEIS, page 10), and long term rangeland condition, trend, and utilization monitoring studies after Implementation (DEIS, pages 9, 125). It is recognized that residual conflicts would remain (DEIS, page 138) but these would be identified through the monitoring studies, which would recommend adjustments in the grazing systems or stocking rates (DEIS, page 9, 138).

- B. Livestock rest periods were designed to improve watershed conditions, vegetation condition and trend, sage grouse, small and nongame habitat values, as well as big game and livestock forage conditions. Primary emphasis was given to improving watershed conditions, considering that soils are the most important resource, upon which all ecosystem functioning depends.

The two references mentioned in the comments (Jensen et al. 1972, Smith et al. 1979) primarily concerned sheep grazing on deer winter ranges, and as such, caution should be used in applying their recommendations on cattle allotments. The concept of using cattle or sheep to reduce competition between the grass and forb-shrub components is not entirely applicable to the plant communities found on deer winter ranges in the EIS area. The low elevation sagebrush stands on these winter ranges typically do not contain appreciable desirable browse production. Given the low palatability of sagebrush, especially in the spring, and virtually no desirable shrub production; grasses and forbs constitute the only available palatable

RESPONSE TO COMMENT LETTER 5

forage and are selectively grazed. Since spring is the most detrimental period of grazing in terms of plant physiological requirements, continuous spring use tends to deplete understory production and affect increases in sagebrush density. This has historically occurred throughout the spring-fall range in the EIS area and has led to widespread poor rangeland conditions for both deer and livestock. Recent literature (DEIS, page 138) indicates that grasses and forbs may be significantly more important to deer winter nutrition than has been recognized in the past, and that the ability of mule deer to consume sagebrush is limited. Thus, a winter range dominated by sagebrush with little else available would characterize poor condition habitat (Roblanette 1952, Blatte et al. 1962, Hostle 1974).

In low elevation piñon-juniper stands, which constitute the other dominant plant community on deer winter ranges in the EIS area, spring livestock use would have no effect on shifts to dominance among grasses, forbs, and shrubs. Piñon-juniper typically occupies shallow, rocky soils which are not conducive to grass-forb production. Understory plants are very widely spaced with shrub production dominating understory biomass. Site aridity determines understory plant composition, rather than competitive interactions among grass-forb-shrub components influenced by herbivore grazing pressures.

On sites where piñon-juniper occurs on deeper soils, the allelopathic effects of tree litter and soil moisture stress imposed by large, shallow root systems of trees, serve to maintain similar understory conditions as those found on sites with shallow, rocky soils.

In conclusion, livestock management, either as proposed in the DEIS or as recommended in the comments, would not affect forb-browse successional trends in piñon-juniper winter ranges. In monotypic sagebrush stands, the only potential for improving deer habitat quality is by increasing grass-forb production. This is what is proposed in the DEIS and it would have a positive influence on deer winter nutrition.

See response to comment E of Comment Letter 12 (Colorado DOW) for more discussion related to proposed livestock spring rest periods.

- C. The long term deer allocation was not increased as much as livestock because of the limited potential for increasing desirable browse production through either grazing management or vegetation manipulations. For the purposes of the long term allotment, all winter ranges in the EIS area were analyzed for their potential for improvement, based on existing habitat conditions, as described by Colorado DOW and BLM browse surveys. Analysis of this data, in light of what was proposed under the action proposal, produced an estimated 11 percent potential increase in winter range carrying

RESPONSE TO COMMENT LETTER 5

capacities. This was based on estimated increases in browse production resulting from vegetation manipulations and improved grazing management. In effect, noncompetitive deer forage (primarily browse) availability limited the degree to which deer carrying capacities could be increased, regardless of the livestock allocation (DHS, Table 4-6, page 139, and Appendix C, pages 286 and 297).

D. See response to comment 3 above.

E. We feel that the statement "nothing of consequence is proposed under the selected alternative to protect or improve riparian or aquatic habitats" is not true. The projects on Lake and Soldier Creeks will enhance riparian zones and improve the aquatic habitat for the Colorado cutthroat trout populations.

It is acknowledged that total exclusion is the most effective measure in restoring aquatic habitats to productive game fish waters, and should be implemented along streams that exhibit the potential to provide a viable fishery, or a critical resource such as the Colorado cutthroat trout populations in Lake, Soldier, and Trappers Creeks. It should be noted, however, that most streams in the EIS area do not meet these requirements, but every stream within the area will be evaluated during development of allotment management plans. Monitoring studies would be established along riparian zones so as to assess the effects of improved livestock management. Those riparian zones and aquatic habitats not responding to improved management would be reevaluated and a determination as to the need for protection made at that time.

The problem that both fishery biologists and range managers face, is the lack of scientific study into the complex affected relationships of the various grazing management plans and their impacts on aquatic and riparian habitats. The preponderance of research to date deals primarily with only two treatments: grazing and exclusion. Even though these studies have concluded that grazing does cause damage in riparian and aquatic habitat, they do not answer many questions that must be answered before a single grazing scheme can be criticized. For example, Duff (1977) found that a short term trespass of livestock had negated four years of improvement, however, he did not state what the intensity of grazing pressure was during this six week period. It would hardly be fair to conclude from this, that any amount of grazing intensity is detrimental, or that total exclusion is the only answer. In *Proceedings of the Symposium, Strategies for Protection and Management of Floodplains, Wetlands, and Other Riparian Ecosystems* (1978), Bohne and Knight state, "In areas where forage and water are well dispersed throughout the watershed and grazing intensity is well managed, livestock grazing is not harmful and can even be beneficial to certain fishery and wildlife values." They further

RESPONSE TO COMMENT LETTER 5

state, "fencing of streams is an effective means of restoring damaged riparian/stream ecosystems but is not a panacea for all our range problems or the only management tool to protect valuable riparian/stream ecosystems". Several workshops and symposia have debated and discussed this issue and almost all have concluded that more research is needed in this area. Most of these symposia have agreed that all range management plans should incorporate measures to protect, restore, and enhance aquatic and riparian habitats. Those measures which have been included in Alternative A are as follows:

1. The AMPs would call for scheduled spring rest periods, which should prove beneficial to certain riparian plant species.
2. The construction of additional water facilities and vegetation treatments to provide additional forage should remove considerable grazing pressure from riparian zones by providing for more even livestock distribution.
3. The reduction in livestock numbers would also provide relief from grazing pressure in riparian areas.
4. Areas that are scheduled to undergo vegetation treatments would receive a complete rest from grazing for two years. Those riparian zones adjacent to these areas will also be rested.

While it is true that "fish and water oriented wildlife could be enhanced by following recommended actions", in scope of riparian and aquatic communities and collection of water flow data within the Pecos basin wildlife habitat area and portions of the White River and San Geronimo (Colorado Division of Wildlife 1977), it is equally true that these same values would be enhanced by implementing the above listed measures.

In fact, some of the recommended measures in this document such as developing and fencing springs and installing troughs and tanks for cattle watering away from these springs were incorporated in Alternatives A, B, E, and F. Other recommendations in this survey which include the construction of fishery reservoirs and stocking of trout in certain stream segments are certainly worthy of consideration, however, these are not considered within the scope of this EIS. Additionally, the planting of willows and grasses along degraded stream segments would not be worthwhile until the allotment management plans (AMPs) and range improvements have been implemented and evaluated.

When each AMP is implemented then monitoring and study programs (DHS, page 9) will be initiated to determine if these resource values are being protected and enhanced. If it is determined that this is not the case, then actions would be taken to modify the AMP or possibly fence these riparian zones to exclude grazing. The

RESPONSE TO COMMENT LETTER 5

Step II multiple use recommendation concerning this issue (NP-1.1 of the WMA NFP) states that "the function of other riparian zones" (other than Lake, Soldier, or Tempesta Creeks) "will be evaluated on a case by case basis and determination made according to the problems present."

The statement that "the preferred alternative does not comply with BLM's Wetland-Riparian Area Protection and Management Guidelines implementing Executive Order 11997" is in error. The intent of this Executive Order is to prevent further degradation of this resource, which is also the intent of the "Guidelines". Degradation is expected to occur only along Brush Creek if the preferred alternative is implemented. If monitoring and study (as stated above) reveals this to be true, measures such as fencing or AWP modification would occur to prevent degradation of this riparian zone. In this way, the intent of the "Executive Order" and "Guidelines" will be fulfilled.

In conclusion, we feel that several of the proposed projects, springs, wells and spring rest, will improve existing riparian zones. The Lake and Soldier Creek projects will greatly improve the aquatic and riparian systems of these two streams. The NFP decision to evaluate every riparian zone and aquatic community on a site by site basis and propose protective measures will help stop the deterioration of riparian and aquatic habitats. The two year rest from livestock use on proposed vegetation manipulations will improve riparian habitats. Although these proposals will not result in excellent riparian and aquatic habitat in the EIS area, they will enhance some and maintain others.

- F. A comprehensive study was conducted in Piceance Basin during 1976 and 1977 by the Colorado DOW (Kraeger 1977). This study will be supplemented with site specific environmental assessments (SAs) on all proposed vegetation manipulations in the EIS area (DEIS, pages 10, 27, 31). In addition, proposed treatment sites will be evaluated in cooperation with the DOW, in order to benefit from their expertise in formulating treatment methods and appropriate mitigation according to critical sage grouse habitat values. BLM management guidelines for sage grouse habitats were issued under RIM Colorado State Office Instruction Memorandum No. CO 77-338. In brief, this memorandum adopted the management guidelines set forth by Braun et al. 1977. Appendix A, page 23, (DEIS) reviews design restrictions on vegetation manipulations which would ensure the protection of sage grouse habitat values.
- G. The Final EIS has been revised, incorporating suggestions in this comment.
- H. Refer to response to comment F above.
- I. The conclusions on impacts to sage grouse are supported by the management recommendations in Braun et al. 1977. Call 1979, as well as by numerous other literature sources. Sage grouse habitat would improve as discussed in the DEIS, page 144, paragraphs 6, 7, and

RESPONSE TO COMMENT LETTER 5

12. The current lack of specific information on seasonal movements and use areas would be mitigated by conducting site specific studies as discussed under response F. The literature references listed above provide habitat indicators for determining activity use areas. Proposed site specific analysis (DEIS, pages 10, 27, 31, 234) would reveal which life function requirements of sage grouse would be most important on each site proposed for treatment. The findings of these analyses would determine appropriate mitigation and manipulative methods.

Also, see changes in the Final EIS, which have incorporated portions of this comment.

In summary, we feel that our conclusions on impacts are valid, based on numerous literature sources and on field observations in the EIS area.

- J. See Errata for DEIS page 1.
 - K. Wildlife water needs would be provided and designed to accommodate expected needs for of the animals using each source (DEIS, page 235).
 - L. Refer to response to comment E above.
 - M. Improvements in aquatic habitat are not expected to increase fishing recreation because of the restricted fish capacities of these streams due to stream size (DEIS, page 147).
- Comment on sage grouse related recreation has been included in the Final EIS.
- N. Refer to the responses to comments E and G above.
 - O. Upon reviewing the research of Duff (1977) and Kinball and Savage (1977), it was found that no mention was made of an evaluation of analysis of the type of AWP set forth under Alternative A of this DEIS. All of these reports deal primarily with exclusion of livestock. How, then, can these documents support or deny the view that range improvements (vegetation treatments and water facilities), spring rests, and livestock reductions will not lead to improved riparian conditions? These studies can only conclude that exclusion of livestock from riparian areas is a method for improving riparian and aquatic habitat conditions. It is not, however, the only method (refer to response for comment E above). The work of Armour (1977) does an excellent job of defining the problems associated with streams that have deteriorated because of overgrazing; however, he does not put forth any "experimental" evidence that fencing is the only solution to the problem. The analysis documented in the DEIS does not state that the AWP of Alternative A will equal total exclusion of livestock in repairing and improving riparian habitats. What it does say is that some modest improvement would occur as a result of this alternative.

RESPONSE TO COMMENT LETTER 5

It is agreed that the first paragraph under "Impacts on Fish" (DEIS, page 147) contradicts the last three paragraphs in this section. The first paragraph of this section will be changed in the Final EIS as follows:

"Impacts to fish habitat would result in either improved or stabilized conditions. In only one case is a decline expected to continue. Improvements would lead to increases in riparian vegetation ground cover, which would enhance streambank stability..."

F. Refer to response to comment H above.

Q. It is believed that this comment on "4 percent reduction of water flow" has been misunderstood. In referring to "Impacts on Surface Water" (DEIS, page 127) it is found that this 4 percent decrease refers to runoff from high intensity storms. In the last sentence of the second paragraph in this section it is stated that "runoff during a normal year is not expected to change significantly". Based on this, it can be inferred that no impacts would occur to endangered fishes of the White River as a result of implementing this alternative.

COMMENT LETTER 6



IN REPLY REFER TO:

DES-60/22

United States Department of the Interior
HERITAGE CONSERVATION AND RECREATION SERVICE
MID-CONTINENT REGION
POST OFFICE BOX 200
DENVER FEDERAL CENTER
DENVER, COLORADO 80202

MAY 24 1980

MEMORANDUM

To: District Manager, Bureau of Land Management
Craig, Colorado

From: Assistant Regional Director, Land Use Coordination

Subject: Review of Draft Environmental Impact Statement for the Proposed
White River Resource Area Grazing Management Program, Colorado

In response to the notice from the Colorado State Office, we have reviewed the subject document and offer the following comments for your consideration.

NATIONWIDE RIVERS INVENTORY

The Nationwide Rivers Inventory is a two-phased screening process being conducted by the Heritage Conservation and Recreation Service (HCRS) to identify the best remaining free-flowing rivers in the nation that may merit protection at the Federal, State, or local level. Phase I of the inventory, focusing on streams or segments still in a relatively natural, undeveloped condition, has been completed nationwide. Phase II, which will consider such positive factors as recreation and wildlife values, is just being initiated in the western regions of HCRS.

Two streams in the White River Resource Area were identified in Phase I as meeting the established criteria—the North Fork White River (White River to Source) and the South Fork White River (White River to Source). The South Fork does not appear to traverse any BLM lands. The North Fork does cross BLM lands in the area of range allotment 6814.

President Carter's August 2, 1979, "Memorandum for the Heads of Departments or Agencies" directs that:

Each Federal agency shall, as part of its normal planning and environmental review process, take care to avoid or mitigate adverse effects on rivers identified in the Nationwide Inventory prepared by the Heritage Conservation and Recreation Service in the Department of the Interior. Agencies shall, as part of their normal environmental review process, consult with the Heritage Conservation and Recreation Service prior to taking actions which could effectively foreclose wild, scenic, or recreational river status on rivers in the Inventory.

COMMENT LETTER 6

District Manager, Craig, Colorado

Page 2

Since lands managed by the BLM in the watersheds of the North and South Forks are very limited in extent and are located in the lowest portion of the watersheds, we do not expect that the preferred grazing plan would have much effect on the quality of the water of the streams. However, we urge the BLM to manage these lands in a manner which will preserve the visual qualities of the stream corridors. In addition, we suggest that the final statement give recognition to the status of the North and South Forks of the White River and describe what effects, if any, the selected plan will have on riparian vegetation where the North Fork crosses BLM-managed lands.



Robert J. Atkins

RESPONSE TO COMMENT LETTER 6

Response to Comment Letter 6

Heritage Conservation and Recreation Service

- A. BLM was unaware of the Phase I Inventory on the North and South Forks of the White River. After reassessment of the impacts of each alternative, we have concluded that the management proposed under each alternative would have no adverse effects which could foreclose wild, scenic, or recreational river status on the North and South Forks.

Grazing management under each alternative would not increase forage utilization above that presently utilized by livestock and wildlife. No range improvements are proposed on any BLM managed land within the North or South Fork corridors. Riparian vegetation on BLM lands along the White River, which includes BLM lands on the North Fork, is in good condition (DEIS, Appendix K, page 310). Proposed management under each alternative would not affect that rating (DEIS, Appendix K, pages 311 through 315).

COMMENT LETTER 7



IN REPLY REFER TO:
L7619 (RMS)PC

United States Department of the Interior

NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
635 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

MAY 13 1980

Memorandum

To: District Manager, Bureau of Land Management, Craig District Office,
Craig, Colorado

From: Associate Regional Director, Planning and Resource Preservation,
Rocky Mountain Region

Subject: Draft Environmental Impact Statement, White River Resource Area
Grazing Management Plan

We have reviewed the subject Draft Environmental Impact Statement.

Enclosed is a copy of our memorandum of March 13 concerning the Bureau of
Land Management's proposed wilderness study areas in Colorado. In that
memorandum, we suggest further consideration of certain intensive inventory
areas adjoining Dinosaur National Monument as additional proposed wilderness
study areas.

Should our recommendations in that memorandum be adopted, the application
of the action alternative to these inventory areas would be altered. We
recommend that the final EIS address this possibility.

Richard A. Strait
Richard A. Strait

Enclosure

RESPONSE TO COMMENT LETTER 7

Response to Comment Letter 7

National Park Service

- A. The wilderness study areas (WSAs) referenced in the March 13 memo-
randum are not within the White River EIS Area. The EIS Area
borders only the south boundary of the National Monument. Proposed
WSAs on the south boundary were dropped from any further wilderness
study as agreed by the National Park Service in the referenced
March 13th memorandum.

COMMENT LETTER 8

United States
Environmental Protection
Agency



JUN 17 1990

Ref: 00-EE

District Manager
Bureau of Land Management
Craig District Office
P.O. Box 248
455 Emerson Street
Craig, Colorado 81625

Dear Sirs:

The Region VIII Office of EPA has reviewed the draft environmental impact statement for the White River Resource Area Grazing Management Program. We regret that these comments are being sent after the period of review noted in the cover letter with this EIS. However, EPA did not receive copies of this EIS until May 6, 1990.

The draft EIS is a very thorough and comprehensive document. In particular we are impressed with the amount and organization of the resource data and the analytical work. EPA believes that this EIS adequately covers the significant environmental impacts and issues of concern. EPA supports the effort by the BLM to improve rangeland conditions for livestock grazing and other uses. We offer the following issues for your consideration in the preparation of the final EIS.

(1) Herbicide Applications

On page 234 of the EIS, it is mentioned that a 100 foot boundary would be kept around riparian zones and live water for herbicide applications. Particularly on aerial spraying, this 100 foot boundary should be considered an absolute minimum. If at all practical, we recommend a 1/2 mile boundary to protect these resources.

The EPA Office of Pesticides Programs, Benefits, and Field Studies Division (BPSD) is currently organizing a multi-state range management research project to analyze benefits and impacts of herbicide management. Colorado is one of six states that will be involved in the project. The BPSD study could be a potentially valuable information resource for future BLM range and management projects. We invite you to contact Mr. Charles Reese, BPSD Project Manager, (FIS 472-5327) or Region VIII contact Dallas Miller (FIS 327-3326) for further information regarding the possible application of this study to the White River situation.

Region 8
Suite 103
Midvale, CO 80645

Colorado, Montana,
North Dakota,
South Dakota,
Utah, Wyoming

COMMENT LETTER 8

(2) Erosion Impacts from Rangeland Management

The EIS contains an impressive evaluation of the erosion potential of each grazing allotment area (Appendix D). The EIS notes that in the short term erosion rates could increase by 1.1 to 7.6 times (page 126) on the land surface itself. Although much of this sediment may never reach surface waters, we wonder whether an assessment was done of the potential impact on specific stream segments. Are there fisheries or aquatic habitat that could be adversely affected by the short-term runoff? If so, some identification of these vulnerable stream segments should be made in the final EIS. It may be appropriate to include mitigation measures such as sediment traps in some cases.

(3) Wilderness Values

The EIS does adequately identify the potential conflicts between wilderness areas under study and rangeland management. The final EIS should briefly identify which kinds of vegetation manipulation techniques or improvements proposed in the recommended plan are or are not compatible with the present wilderness status of the study areas.

Based on EPA's system for evaluating EIS's under its review, we have rated this EIS as LD-2. This means we have no objection to the project as proposed. We would appreciate additional information in the final EIS to answer the above points.

Please contact Mike Gansack of my staff (FIS 327-4831) for any further assistance you may require on this EIS review.

Sincerely yours,

Gene A. Lucero, DRA

for
Roger L. Williams
Regional Administrator

RESPONSE TO COMMENT LETTER 8

Response to Comment Letter 8
Environmental Protection Agency

A. Proposed herbicide applications would receive a site specific environmental assessment (EA) (DEIS, page 10) and would be subject to approval of a Prescribed Spraying Plan (DEIS, page 236). The EA and the spraying plan would identify application procedures, environmental conditions, controls, and coordination necessary prior to any application. The distance from live waters or riparian zones would be identified in the EA and the spraying plan. The 100 foot from live water or riparian zones is the minimum distance, as identified in the land use plan, that herbicide application would be allowed. The EA would assess the site specific impacts of herbicide application using current research, such as that cited, to determine distances from live water or riparian zones.

B. It is possible that short term soil erosion rates could increase by 1.1 to 7.6 times that of present conditions as a result of vegetation manipulations (DEIS, page 128). Based on the restrictions which would be placed on any treatment (DEIS, page 10, items 5 and 6, and page 236, items 1, 3, 4, and 13), short term sediment yields are not expected to have an adverse effect on any vulnerable fisheries or aquatic habitats.

In addition to the assessment in the DEIS, a site specific EA would be conducted for each land treatment. This EA would identify adverse impacts to any stream segment and recommend necessary measures to mitigate any adverse impacts.

C. No ranged management actions, changes in grazing use or new range improvements, would be allowed in the site wilderness study areas (WSAs) that would impair the suitability of the WSAs for wilderness designation (DEIS, page 10). Present policy and management of the WSAs (Interim Management Policy and Guidelines for Lands Under Wilderness Review, BLM 1979) allows changes in existing livestock grazing use, development of grazing systems, and development of range improvements, so long as such actions do not impair the suitability of the WSAs for further wilderness designation.

Briefly, range improvements which can be developed include livestock watering areas, permanent fences and permanent water developments (springs and reservoirs). These range improvements must blend with the landscape and topography. The only vegetation manipulations allowed in WSAs are maintenance of existing treatments, control of small areas of poisonous plants, insects or diseases, and reseeding native plants by hand or aerial methods.



COLORADO DEPARTMENT OF HEALTH

4210 EAST 11TH AVENUE • DENVER, COLORADO 80270 • PHONE 320-8333
Frank Traylor, M.D., Executive Director

DATE: June 3, 1980

SUBJECT: NON-STATE ASSISTANCE

REVIEW AND COMMENTS

TO: District Manager
Bureau of Land Management
Craig District Office
P.O. Box 248
455 Emerson Street
Craig, Colorado 81625

PROJECT TITLE: White River Resource Area Grazing Management DEIS

STATE IDENTIFIER:

COMMENTS: NO COMMENTS

SOC-3, Jan 79

Steve Kelney
Name, Title
Steve Kelney
Environmental Planning Coordinator

COMMENT LETTER 10



COLORADO STATE DEPARTMENT OF HIGHWAYS

June 3, 1980

Mr. Philip H. Schuck
Director
Colorado Division of Planning
520 State Centennial Building
1515 Sherman Street
Denver, Colorado 80203

Dear Mr. Schuck:

The Colorado Department of Highways has completed its review of the Draft Environmental Impact Statement for the White River Resource Area Grazing Management and has the following comments.

While it does not appear that this project will have any significant impact on the highway system in the area, some mention should be made in the Final EIS of the transportation facilities in the area and what effects an increase in recreational visitors and hunters will have on these facilities.

Thank you for the opportunity to review this document.

Very truly yours,

Harvey R. Atchison
Director
Division of Transportation Planning

By *Barbara L.S. Chocoi*
Barbara L.S. Chocoi
Manager
Impact Evaluation Branch

RG

4201 EAST ARKANSAS AVENUE DENVER, CO 80222 (303) 757-9011

RESPONSE TO COMMENT LETTER 10

Response to Comment Letter 10

Colorado State Department of Highways

A. Increases in recreational visitors cannot be determined because of the lack of data on existing recreational use of public lands in the EIS area. Present recreation use (other than big game hunting) is estimated to be light with only a slight increase anticipated from actions proposed in the EIS.

Big game hunting opportunities, as the result of the implementation of the proposal, are expected to decrease hunter recreation days by 18 percent. This use, if spread over the three existing big game hunting seasons, would amount to an increase of approximately 6 percent in hunter recreation days in each season.

Based on this analysis, it is expected that the effects of the proposal or alternatives would be insignificant as noted on page 125 of the EIS.

COMMENT LETTER 11



Department of Local Affairs Colorado Division of Planning

Philip H. Schuck, Director

MEMORANDUM



Richard D. Lauer, Governor

DATE: June 20, 1989

TO: Steve Ellis, Colorado Clearinghouse

FROM: Philip H. Schuck

SUBJECT: White River Resource Area Grazing Management
DEIS #88-127

The Division of Planning has reviewed the White River Resource Area Grazing Management Draft Environmental Impact Statement prepared by the Bureau of Land Management. We would like to address several elements in this document relating to the impacts of the proposed management system on social conditions and land uses.

A The document states that in the short term some 92 ranch families would be adversely affected through the loss of livestock grazing allotments in accordance with rangeland requirements for forage lands. Many ranches badly need the additional high country summer forage that public lands can offer. The final environmental impact statement should make an effort to estimate how many of the affected ranch families might completely lose the economic viability of their ranching operations because of the loss of grazing allotments. If there is loss of economic viability for ranching in the White River Resource Area, the impacts would be extremely significant both in human costs to the families involved as well as increased development pressure on current open space. We urge that all possible mitigating measures be considered. There may be some possibility for equitably redistributing remaining grazing land among ranchers with existing allotments.

B The Environmental Statement provides for conversion of 42,723 acres (over 66 square miles) of piñon-juniper forest to grassland through the method of chainings (page 161). As identified in the Draft Impact Statement, the environmental consequences of these chainings are extensive. The Division urges that BLM evaluate the need for the total acreage of land use conversion, consider alternative methods of treatment, and weigh the extensive damages to forest flora and fauna. In addition, we note that there are several overlaps between the chainings areas identified on Map 3-4 (page 97) and the deer concentration areas on Map 3-13a (page 127). We recommend that BLM analyze the effects of the chainings program on the wildlife and related recreational uses of these areas.

C Finally, there is very little discussion of energy developments expected to occur in the Resource Management Area. We encourage consideration of impacts of current and anticipated mining activities that would affect the grazing management system. The analysis should include possible losses of grazing land due to mining conflicts. Such an analysis should consider the secondary impacts of mining, including additional urban development and increased recreational demands in the area.

PHS/btn

320 State Centennial Building, 1313 Sherman Street, Denver, Colorado 80202 (303) 892-2251

RESPONSE TO COMMENT LETTER 11

Response to Comment Letter 11

Department of Local Affairs, Colorado Division of Planning

- A. It is not possible to estimate how many operations would go out of business or how much land would be converted to nonranching uses (DEIS, page 154) because of the lack of information on individual operations as well as the wide range of options available to them.
- B. Bureau policy is strongly committed to reducing the economic impacts to operators as much as possible. Livestock use adjustments would be scheduled over a three year period (current BLM policy) to allow the operators time to make adjustments in their operations and to provide a period for range improvements which could increase the potential of the allotment before full reductions are required. Redistributing use among allotments is possible, but the existing qualifications of each allotment on an allotment must be fulfilled first before any use can be granted to a new permittee on that allotment. In many cases, as noted by the long term rangeland potential (DEIS, Appendix B), existing qualifications would not be fulfilled.
- C. As noted in the DEIS (pages 9, 232) not all acreages proposed would be treated because of the design restrictions (DEIS, page 234) that would be placed on these treatments. In addition, each treatment proposed would receive a site specific environmental assessment which would identify the adverse impacts and necessary mitigation (DEIS, page 10).
- D. Refer to response for comment F of Comment Letter 12.
- E. BLM does recognize the energy development that could and probably will occur in the White River Resource Area. However, we do not know the extent of such energy development or how much land would be lost for livestock and wildlife grazing. Any attempt to anticipate what effects energy development would have on rangeland management and the livestock industry would be, at best, speculation at this point. The effects of energy development were not considered to be in the scope of this EIS so all alternatives were evaluated in the absence of this development. The energy development which occurs in the future will have to deal with the effects on rangeland management prior to its development.

COMMENT LETTER 12

STATE OF COLORADO
 E. Todd Lusk, Governor
 DEPARTMENT OF NATURAL RESOURCES
 DIVISION OF WILDLIFE
 Jeff D. Gann, Director
 6700 Broadway
 Denver, Colorado 80216 (303-1102)



Mr. Phillip H. Schuck, Director
 Colorado Division of Planning
 500 Centennial Building
 1313 Sherman Street
 Denver, CO 80203

Attention: Steve Ellis

Dear Mr. Schuck:

This Division has had an opportunity to review the draft environmental impact statement for Proposed Grazing Management Program for the White River Resource Area, prepared by the Bureau of Land Management. Because of the tremendous wildlife values involved in this area, reviewers within this Division included field, staff and research personnel. Our comments and recommendations on this document are enclosed.

Thank you for providing us with the opportunity to respond to this statement.

Sincerely yours,

Jack R. Gann
 Jack R. Gann
 Director

JRG:RH
 Enclosure

cc: M. Pascoe
 R. Evans
 P. Barrows
 P. Olson
 L. Lines
 B. Gill
 R. Bartmann

DEPARTMENT OF NATURAL RESOURCES, Monte Passon, Executive Director • WILDLIFE COMMISSION: Wilbur Rodden, Chairman
 Donald Farnsworth, Vice Chairman • James Smith, Secretary • Jean K. Todd, Member • Norman C. Williams, Member
 Michael Higgins, Member • Sam Casali, Member • Richard Donahue, Member

COMMENT LETTER 12

COMMENTS AND RECOMMENDATIONS
 ON DRAFT ENVIRONMENTAL STATEMENT
 WHITE RIVER RESOURCE AREA
 GRAZING MANAGEMENT

JUN 18 1980

DNV OF PLANNING

The comments and recommendations contained herein are based on an extensive staff and field review of the subject document by the Colorado Division of Wildlife (CDW) and an interagency meeting with the Bureau of Land Management (BLM) and the U.S. Forest Service (USFS).

Considering the time frame in which this draft environmental statement (DES) was prepared and the limited experience of the preparers with area, the subject document is well done. However, in the judgment of the CDW, such additional work is needed in preparation of the final statement. It is hoped the comments and recommendations offered by the CDW will be helpful in this regard.

This response will address areas of general concern first, followed by specific remarks on the text of the DES.

GENERAL CONCERNS

The White River Deer Herd is the largest migratory mule deer herd in North America and, as such, represents a resource of tremendous significance to the people of this nation as well as the citizens of Colorado. Accordingly, this resource is deserving of such greater consideration than that offered by the proposed action, Alternative A.

While not belittling the importance of the range livestock industry in the White River Resource Area (WRRA), the CDW submits that a more equitable allocation of range forage between livestock and big game animals would be in the public interest. The CDW has projected an increase in deer numbers of 23 percent will be needed in northwestern Colorado to meet the State's management objectives for this species (Colorado Division of Wildlife, 1977). Based on long term forage allocations under different management options and calculations made by BLM, Alternative A would provide less than half the percentage increase needed. Since the deer herds of the WRRA constitute the major deer factory in this portion of the state, it is imperative that every precaution be taken to ensure that population objectives are met. Alternative E could best meet the objective in conjunction with continued use by range livestock and wild horses.

After meeting with BLM personnel, the CDW now understands the rationale that was used to calculate populations of big game animals and carrying capacities but still has reservations about the system used and its end products.

Population estimates for deer on the BLM lands within the WRRA do not allow for the fact that deer densities are likely to be higher on public than on private lands.

1/

Submitted to Colorado State Clearinghouse by Colorado Division of Wildlife, June, 1980.

COMMENT LETTER 12

1 dietary overlap, which is basic to any determination of the degree of competition between domestic and wild ungulates and is essential in making forage allocations, is extremely difficult to ascertain with any degree of precision. Results of food habit studies vary widely even within a species, depending on the technique used and the geographical differences in types of forage available. References cited in the USFS are from areas having different characteristics than those in the WRA and data available for the WRA were overlooked. Furthermore, basing dietary overlap on broad forage categories, such as grasses, forbs and shrubs, fails to recognize differences in preferences for plants within these categories, differences that have been demonstrated by studies in the WRA.

2 It is extremely doubtful that, given the present state of the art of measuring the degree of range utilization by big game ungulates, long-term changes in big game forage consumption of populations projected in Alternatives A and E could even be detected.

3 The USFS finds spring rest from livestock grazing on deer winter ranges difficult to accept. While such a practice may improve forage conditions for livestock, it has the opposite effect on deer. We urge BLM to reexamine its use of this practice, at least on the more important winter deer ranges.

4 Vegetative manipulation in the piñon-juniper and sagebrush types also gives us cause for alarm. Some of the costs proposed for P-2 removal already support some of the highest deer densities in the area, suggesting that the presence of P-2 is more than a coincidence. The USFS fails to address the problem which might be created by P-2 and sagebrush removal in respect to changes in snow conditions. Increases in snow depth and crusting, which are likely to occur, could result in a greater expenditure of energy by deer than would be compensated for by the increased supply of understory vegetation. No where in the USFS do we find reference to guidelines for vegetative manipulation that will protect big game and sage grouse habitat, such as those by Braun, Britt and Wallestad, 1977; Reynolds, 1964; USGS/Forest Service, 1969; and Minnich, 1969.

5 So where in the USFS could we find any mention of range fertilization as a habitat improvement tool. Fertilization has the greatest potential for improving the habitat while causing the least adverse environmental impacts.

6 Allocation of wildlife forage by livestock allotments, while useful in distributing RMA's for USFS purposes, cannot serve as a basis for wildlife management. The reality of wildlife, problems with hunter access, and management principles make management on such size units impractical. Furthermore, there is the problem of livestock permittees becoming disturbed when wildlife numbers on these allotments appear to exceed the RMA's allocated.

7 The BLM fails to mention a Survey of Riparian and Aquatic Communities and Collection of water for the Lower San Juan Wildlife Habitat Area and Portions of the White River and Moon Creek Drainages, done by the Colorado Division of Wildlife (1977) in cooperation with BLM as a Sikes Act project, which showed all riparian habitats to be in poor or fair condition. The proposed action alternative does little to remedy this condition, in our opinion. Of 297 acres of riparian habitat only 68 acres will be improved to a good condition, while the other 229 acres would remain in poor or fair condition. Because livestock tend to congregate in riparian areas for water, over utilization of riparian vegetation is inevitable unless exclusion measures

COMMENT LETTER 12

are taken. Only 6.5 miles of stream along lake and Soldier creek will be protected by exclusion with fencing. If riparian vegetation is not adequately protected, the 45 miles of stream slated to be improved will only suffer further degradation. Executive Order 11950 was issued to prevent further destruction and degradation of wetlands and riparian habitats. The USFS does not adhere to these guidelines and should be modified to do so.

8 The economic benefits generated by wildlife in the WRA are considerable but seem to command little notice when compared to those of livestock. The action alternative compromises such of wildlife's economic potential in lieu of the local livestock economy. The USFS says range improvements in lieu of the cost-benefit analysis. Estimated costs are shown in the USFS but the corresponding benefits are omitted. Additionally, it was noted that a multiplier was used in evaluating the economic value of the livestock industry but not the economic value of wildlife.

9 Although we understand that the omission of any conflicts between grazing and energy development in the WRA is a policy matter, failure to consider these existing and potential conflicts, particularly in this resource area, greatly diminishes the value of the USFS.

SPECIFIC COMMENTS AND RECOMMENDATIONS

10 Page vi and 12: We are not convinced that the no action alternative (B) would result in a net decline of big game, as is indicated on these pages.

11 Page xiii: It is our recommendation that the literature cited section be listed in the Table of Contents.

12 Page 10: Provisions should be made under Standard Design, Construction, and Operation procedures to survey potential conflicts with threatened and endangered wildlife species listed by the State of Colorado and to consult with the DOI prior to taking any action that might affect these species, similar to the treatment mentioned here for federally designated species. From comments elsewhere, we are sure this is BLM's intent.

13 In order to have a cost-benefit analysis for range improvements, anticipated benefits should be quantified.

14 Page 27: Under Alternatives A, D, E and F, it is stated that vegetative manipulations will "...be subject to site specific analysis to determine wildlife needs and values of the area to be treated." Here could be a good place to include guidelines for protecting wildlife values, as mentioned earlier in the USFS comments.

15 Page 67: Why is the past tense used in the statement: "The white river deer herd was considered to be the largest migratory mule deer herd in North America..."? Is there another herd that is presently larger?

16 Page 69: Contrary to the statement made here, shrubs and grasses comprise the largest portion of the elk diet in this area (Byrd, 1970).

17 Hunting should not be listed as a limiting factor on elk; it is a management tool which is intentionally applied and is, therefore, subject to manipulation.

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T Page 72: In the discussion of Other Birds, the importance of the area as riparian habitat, particularly for golden eagles and red-tailed hawks, should be mentioned. Additionally, other game birds, including blue grouse, wild turkey, ducks and doves should be mentioned.

V Under Threatened and Endangered Species, whooping cranes have been observed twice in the area, not once, as indicated here.

V Page 73: Map 3-10 should be referred to under Threatened and Endangered Fish.

V Page 82 and 83: Income from wildlife should be mentioned here. Although no multiplier has been determined for Rio Blanco County, a multiplier for another rural county, Grand, of 1.39 should be fairly representative of the situation in Rio Blanco County (Sisley and Lovegrove, 1970).

V Page 125: Assumption No. 10 presumes wildlife habitat carrying capacities can be accurately determined. This relates to Assumption no. 12 on reliability of available data. Present techniques are not sophisticated enough to accurately determine big game carrying capacities. The BLM, USFS and GWR are all working on research projects that should ultimately make such determinations possible.

W Page 132: In the Conclusions of Impacts on Terrestrial Vegetation section, use of shrubs is assumed to be solely due to wildlife, primarily deer, and unaffected by livestock use. However, with much of the use of the area by livestock occurring in spring, winter and fall, this assumption is probably erroneous. With the seasonal grazing patterns for domestic livestock prescribed under Alternative A, the proposed action, winter shrub ranges needed by deer will more than likely deteriorate.

X Page 134: Under the second introductory paragraph of Impacts of Riparian Vegetation, second sentence, one or more words are missing. The paucity of data on relationships between grazing management and riparian vegetation, as stated here, is misleading at best. The writer of this section should consult Kistal and Savage (1977), and a collection of papers presented at several symposia including: Owen (1979), Graul and Bissell (1978), Johnson and McCormick (1979), and Johnson and Jones (1977).

Y Page 165: The problem of deer mortality on deer winter ranges and migration routes could be partially mitigated by letting down fences, modification of fencing specifications and installation of deer gates in those locations where investigations demonstrate a need.

Z The final statement on this page relative to Alternative A that: "No conflicts are anticipated with other Federal, state or local land use plans," while probably true in the strict interpretation of land use plans, is certainly in conflict with Colorado's strategic wildlife plan (Colo. Div. of Wildlife, 1977). The DOW recommends that any departure from state plans in the selected alternative be explained in detail along with the rationale for doing so. This would appear to be consistent with Section 102(a)(2) of the Federal Land Policy and Management Act of 1976.

DISCUSSIONS

AA In addition to the literature mentioned in the DOW comments, there is a wealth of literature on the effects of livestock and deer use of native ranges at the Little Hills Experiment Station that should be consulted because of its geographical relevance to the MRA. Only a portion of this research was

COMMENT LETTER 12

Included in Meehan and Bartsch (1971), which was cited in the RGS. Other references, which should be consulted are Baker (1970), Grieb (1979) and Mustard (1959).

LITERATURE CITED

Following are complete references for literature cited in these comments and recommendations.

- Baker, B.O. 1970. Big game winter range analysis, Game Unit 22 - Piceance. Colo. Div. Wildl. Denver, 86 pp.
- Boyd, R.J. 1970. Elk of the White River Plateau, Colorado. Colo. Game, Fish and Parks Dept. Tech. Publ. 25. 136 pp.
- Brown, C.E., T. Britt and R.D. Willestad. 1977. Guidelines for maintenance of sage grouse habitats. Wildl. Soc. Bull. 5(3): 99-106.
- Colorado Division of Wildlife. 1977. Today's strategy-tomorrow's wildlife, a comprehensive management plan for Colorado's wildlife. 96 pp.
- Colorado Division of Wildlife. 1977. Survey of riparian and aquatic communities and collection of water flow data within the Piceance Basin wildlife habitat area and portions of the White River and Roan Creek drainages. In cooperation with BLM. 111 pp.
- Graul, W.D., and S.J. Bissell (Tech. Coord.). 1979. Inland river and stream habitat in Colorado: a symposium, Oct. 4-5, 1978, Greeley, CO. Colo. Chapt. Wildlife Soc. and Colo. Audubon Assoc. 195 pp.
- Grieb, J.R. 1979. Allocation of range resources for wildlife (pp. 40-42) in Range land policies for the future: proceedings of symposium, Jan. 26-31, 1979, Tucson, AZ.
- Johnson, R.R., and D.A. Jones (Tech. Coord.). 1977. Importance, preservation and management of riparian habitats: a symposium, July 2, 1977, Tucson, AZ. USDA For. Serv. Tech. Rept. RM-43. 215 pp.
- _____, and J.F. McCormick (Tech. Coord.). 1979. Strategies for protection and management of floodplain wetlands and other riparian ecosystems: proceedings of the symposium, Dec. 11-13, 1978, Callaway Gardens, GA. USDA For. Serv. Gen. Tech. Rept. WO-12. 410 pp.
- Kistal, J., and F. Savage. 1977. Diamond Fork aquatic and range habitat improvement. USDA For. Serv., Uinta Mnt. For. 19 pp.
- Minnich, D.W. 1969. Vegetative response and patterns of deer use following chaining on piñon-juniper forests. Amer. Soc. Range Mgmt. Abst. of Papers Ann. Mtg. 22:35-36.
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COMMENT LETTER 12

Owen, N. (Chairman). 1979. Grazing and riparian/stream ecosystems: proceedings of Forum, Nov. 3-4, 1978, Denver, CO. Trout Unlimited Inc., Denver. 94 pp.

Reynolds, M.C. 1964. Elk and deer habitat use of 2 piñon-juniper woodland in southern New Mexico. Trans. N. Amer. Wildl. and Natur. Resour. Conf. 29:438-444.

Rohdy, D.D., and R.E. Lovegrove. 1970. Economic impact of hunting and fishing expenditures in Grand County, Colorado, 1968. Dept. Economics, Colo. State Univ., Ft. Collins. 36 pp.

USDA Forest Service. 1969. Wildlife Habitat Improvement handbook (FSH 2659.11). U.S. For. Serv. No pagination.

RESPONSE TO COMMENT LETTER 12

Response to Comment Letter 12

Colorado Division of Wildlife

- A. The long term deer forage allocation was based on the Management Framework Plan and Piceance Basin Habitat Management Plan objectives which are to sustain deer populations in balance with carrying capacities. The long term 11 percent increase in the deer population indicated in Alternative A was based on an estimate of anticipated increases in deer forage production. An estimate, it is subject to revision, pending the accumulation of future information, which could more accurately determine big game carrying capacities. Cooperatively sponsored (BDM, DOW, FS) forage production studies and BLM utilization and condition and trend studies (DEIS, page 9) should aid in accumulating better information upon which management objectives should be based. The DOW's proposed 23 percent increase in mule deer populations appears to be primarily based on anticipated demand, not primarily based on winter range carrying capacities.
- B. Mule deer populations were derived from Colorado DOW data on mule deer densities, and were developed in coordination with local DOW personnel. Data available at the time deer populations were determined did not specify different densities for public, private, or State lands. The population estimates by land ownership were based on the mule deer densities by seasonal use areas with those densities applied to all land ownership within that seasonal use area.
- C. The comments regarding the many problems and variables involved in the forage allocation process are also recognized by BLM. Unfortunately, data was not available for the purposes of more finely dividing broad forage categories. Even though many of the forage preference studies used in the DEIS were from geographically dissimilar areas, professional judgement was used in applying their results. In effect, those studies which were conducted in areas similar to the RIS area, were given greater credence than those from dissimilar areas. It should be noted that the dietary composition of mule deer on winter range used in the DEIS (Appendix C) is very similar to the findings of DOW's recent forage preference (bite-count) study conducted in Piceance Basin from 1978-1980.
- D. BLM recognizes the problems in measuring forage utilization. As such, carrying capacities and populations should be considered as only estimates, subject to change with the accumulation of more accurate data in the future.
- E. Recent literature (referenced in DEIS, page 138) and studies conducted in the RIS area give indications that spring rest from livestock grazing is not necessarily insidious to deer habitat values, as is commonly presupposed. The literature referred to above showed that mule deer select for herbaceous forage during

RESPONSE TO COMMENT LETTER 12

winter when and where it is available. BLM rangeland trend studies, having been monitored since the mid to late 1960's on the Black's Gulch and Square 5 allotments (both of which contain critical winter range), do not reveal any declining broom trends. These allotments have been managed under AMPs with rotational spring rest periods for the past 13 years. Thus, this information raises several questions which merit closer examination before any definite statements about the adverse impacts of rest from spring livestock use on deer winter ranges can be put forth with certainty. Realizing this situation, we proposed spring rest from livestock grazing with the primary objective of conserving soil and watershed values, upon which a host of other resource values are dependent (i.e., big game, livestock, small and nongame, and sage grouse habitat conditions). It should be noted that the cyclic rest periods (Appendix 9, Table B-1) proposed in the DEIS will be developed during AMP implementation, after site specific interdisciplinary reviews and consultation with the Colorado DOW. See response to Comment Letter 5 (USFWS), comment 8 for more discussion related to proposed livestock spring rest periods.

- F. These references as well as others were used in the impact analysis and in developing NHP recommendations, upon which design restrictions (Appendix A) and mitigations (pages 9, 10, and 27) in the DEIS were based. It is felt that these proposed restrictions, coupled with site specific environmental analysis (DEIS, page 10) will serve to improve deer habitat conditions. The potentially adverse impacts of pronghorn/jumper manipulation and the proposed acreages (DEIS, page 14) represent a worst case assessment, in that the actual acreage that would be treated could be less after site specific analysis and mitigations were applied.
- G. Range fertilization was not proposed because it was not recommended in the NHP. The reason for this was that fertilization typically results in only limited short term benefits in comparison with vegetation manipulation, and does not change plant composition to meet management objectives.
- H. We concur with your comments regarding the impracticability of managing big game populations by livestock allotment. The reason this was done was to more accurately determine livestock stocking rates (as mandated in FPMR) through the identification of competitive forage with big game populations to an allotment. As in the past, it is BLM policy to submit harvest recommendations to the Colorado DOW on the basis of herd (game management) units.
- I. A Survey of Biplanar and Aquatic Communities and Collection of Water Flow Data within Piceance Basin Wildlife Habitat Area and Portions of the White River and Ross Creek Drainages (Colorado DOW, 1977) was used extensively in the development of the Data Resource Analysis (DRA) for both the Rangeland and Piceance Planning Units, which served as a source of baseline information for this DEIS. Additionally, many of the multiple use recommendations (i.e.,

RESPONSE TO COMMENT LETTER 12

development and fencing of spring sources and fencing of key riparian areas) outlined in the Management Framework Plan (MFP) were also taken from this survey.

- J. Refer to the response to comment E of Comment Letter 5.
- K. Refer to the response to comment E of Comment Letter 5.
- L. The Bureau recognizes the considerable economic value of wildlife in the WRA. However, the basic data to enable us to do an analysis and comparison of the economic benefits to the local economy from wildlife and livestock is not available. The only economic values which could be quantified for wildlife were those for big game hunting, and these values could only be quantified at the State level due to the lack of basic data at the local level. The allotment management plans (AMPs) and their respective range improvements would be subject to cost-benefit analysis (DEIS, page 10). AMPs will be prepared after approval of the Final EIS (DEIS, page 10), thus, no cost-benefit analysis has been done. The multiplier effect from wildlife-derived income is included in the respective figures used in the DEIS. The multiplier used is for the State economy.
- M. Refer to the response to comment E in Comment Letter 11.
- N. The projected decline in big game populations under the No Action Alternative is legitimately debatable. The rationale behind our conclusion, that a lack of vegetation manipulations, continued livestock use of browse due to heavy livestock stocking rates, poor livestock distribution patterns in response to a lack of water sources, etc., is found on pages 160-167 in the DEIS.
- D. The Literature Cited Section is listed in the Table of Contents on page xii.
- P. This comment has been added to Item 1 on page 10 in the Final EIS.
- Q. See the response to comment M above.
- R. See the response to comment F above.
- S. These comments have been included in the Final EIS.
- T. Applied mitigations proposed in the DEIS would result in no significant impacts to these species. CRU regulations restrict the Affected Environment section to discussion of significantly impacted species only. See also the response to Comment Letter 14.
- U. These comments have been included in the Final EIS.

RESPONSE TO COMMENT LETTER 12

- V. No basic economic data for wildlife is available for Rio Blanco County to which the multiplier for Grand County could be applied.
- W. See Errata for DEIS, page 132.
- X. Refer to response to comment E above.
- Y. All of the references listed except Gaul and Blaisell (1978) have been consulted. The contributors to these symposia and study present little or no evidence that exclusion of livestock is the only solution to the problem of riparian habitat degradation. Most contributors have agreed that "free choice, uncontrolled grazing is incompatible with the fishery, wildlife, and aesthetic resources" in riparian areas, however, very little mention is made of the effects of controlled grazing. Most of these symposia, including the study by Kimball and Savage (1977), have concluded that certain range management and improvement measures can be beneficial to the riparian habitat (refer to the response to comment E of Comment Letter 5).
- Z. BLM Manual 1737 encompasses fencing specifications to minimize deer mortality. Construction will be subject to additional modification resulting from site specific analysis (DEIS, pages 141, 231).
- AA. This comment has been included in the Final EIS.

COMMENT LETTER 13



COLORADO
HISTORICAL
SOCIETY

The Colorado Heritage Center 1300 Broadway Denver, Colorado 80203

May 21, 1980

Mr. Stephen O. Ellis
Principal Planner
A-95 Clearinghouse
520 State Centennial Building
1313 Sherman Street
Denver, CO 80203

Dear Mr. Ellis:

This office has received and reviewed the Draft Environmental Impact Statement for the White River Resource Area Grazing Management, #80-127.

Cultural resources have been dealt with in a Programmatic Memorandum of Agreement between the Bureau of Land Management, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, therefore, no further comment is necessary.

If this office can be of further assistance, please call the Compliance Section at 839-3391.

Sincerely,

Arthur C. Townsend
Arthur C. Townsend
State Historic Preservation Officer

ACT(HJG):ng

COMMENT LETTER 14

UNIVERSITY OF COLORADO
College of Arts and Sciences
BOULDER, COLORADO 80509

Department of Integrated Studies
Ketchum 128

21 May 1980

District Manager
Bureau of Land Management--Craig District
Box 248
Craig, Colorado 81625

In response to a request (CO-922, 1792, NIOH) from Mr. Dale Andrus, I wish to comment briefly on the "Draft Environmental Impact Statement, White River Resource Area, Grazing Management," dated 23 April 1980.

I have read the draft statement with particular interest in terrestrial nongame wildlife. Except for a brief review of literature on effects of chaining on rodents, treatment of the nongame wildlife resource is inadequate.

At the very least, a faunal checklist should be appended. This would allow the reader some insight into the diversity of the fauna. Better still, the distribution of the fauna across habitat types could be tabulated.

Data for such appendices are readily available:

Biswell, S. J., ed. 1976. Colorado annual distribution batllong study. Colorado Division of Wildlife, Denver, iv + 29 pp.

Kingery, R. E., and W. B. Gould. 1979. Colorado bird distribution batllong study. Colorado Division of Wildlife, Denver, vii + 58 pp.

Langlois, R., ed. 1976. Colorado reptile and amphibian distribution batllong study. Colorado Division of Wildlife, Denver, 17 pp.

Also see the primary literature on which those compilations are based.

Thanks for the opportunity to comment on the Draft EIS.

Sincerely,

David M. Armstrong
David M. Armstrong
Associate Professor--Biological Science

RESPONSE TO COMMENT LETTER 14

Response to Comment Letter 14

University of Colorado

A. An impact analysis of the effects of livestock grazing and associated range developments on nongame wildlife was conducted. The analysis did not reveal any impacts that could be considered significant, other than those discussed in the EIS.

Under current CED regulations, impacts not considered to be significant are not to be included in the EIS. The regulations also impose a limitation on the length of an EIS of approximately 150 pages which restricts the amount of space available for any in-depth discussion of topics other than significant issues or significant impacts.

B. The comments received also suggested appending a faunal checklist in order to afford the reader some insight into faunal diversity within the EIS area. On this point CED regulations stipulate that EISs be analytic rather than encyclopedic. Faunal lists for the EIS area are on file (Unit Resource Analysis) in the WRA office and are available for dissemination to interested readers.

COMMENT LETTER 15



STATE OF UTAH
Scott M. Matheson
Governor
Kent Briggs
State Planning Coordinator

Division of Policy and Planning Coordination
Intergovernmental Relations Section
Lorayne Tompsett, Associate State Planning Coordinator
124 State Capitol
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Environmental
Coordinating
Committee
533-4798

Human Resources
Coordinating
Committee
533-4881

A/BS
Federal/State
Coordination
533-4983

Federal Resource
Information
Center
533-4982

District Manager, BLM
Craig District Office
P. O. Box 265
455 Emerson Street
Craig, Colorado 81625

SUBJECT: DEIS, White River Resource Area Grazing Management
(SAI#600428088)

Dear Sir:

The Utah State Environmental Coordinating Committee has reviewed the information in the DEIS, White River Resource Area Grazing Management. The Committee has identified no discrepancy with existing state plans and objectives.

Committee members would like to thank you for the opportunity to review this material. It is helpful in clarifying alternatives on the proposed action.

Sincerely,

Lee M. Allen

Lee M. Allen
A-95 Coordinator

LMA:15j

June 10, 1980

COMMENT LETTER 16

LAW OFFICES
McCANDLESS & BARRETT

THIRD FLOOR

200 B STREET, N.W.

WASHINGTON, D.C. 20006

June 19, 1980

ROBERT C. McCANDLESS
DAVID M. BARRETT
RUSSELL A. GASPAN
MICHAEL R. DE JUAN
ROBERT W. LOCKLIN
JOSEPH E. SCHWILKE
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AS MEMBERS IN NEW YORK STATE

EDWIN J. HARRIS

EDWIN J. HARRIS

NEW YORK OFFICE

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200 B STREET, N.W.
WASHINGTON, D.C. 20006
CALIFORNIA OFFICE

JUN 23 1980

Mr. Dale R. Andrus
State Director
Bureau of Land Management
Colorado State Bank Building
Room 700
1600 Broadway
Denver, Colorado 80202

Dear Mr. Andrus:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement on the Proposed Grazing Management Program for the White River Resource Area. The American Horse Protection Association has considered carefully those parts of the program which would have a direct impact on wild horses.

AMHP is pleased that the Bureau has recognized that effective land management necessitates a reduction in AWM allotted to cattle. However we cannot understand, and the draft EIS does not sufficiently explain and document, why BLM proposes to eliminate 86% of the wild horse herd but only reduce actual short-term livestock used by only 20%.

The proposed removal of 535 of a total 625 wild horses under Alternative A, the favored alternative, flies in the face of the purpose and intent of the Wild Free-Roaming Horses and Burros Act. It is the stated intent of Congress that the wild horses "... are to be considered . . . an integral part of the natural system of public lands . . . all management activities shall be at the minimum feasible level . . . 16 U.S.C. §1131(c)(1976 (emphasis added)). Surely, even the Bureau recognizes that an 86% reduction in the total herd population exceeds the "minimum feasible level."

Furthermore, the proposal to remove 100% of the wild horse population outside the 167,000 acres which will be allotted to the wild horses is an outrage. It is stated in the Environmental

COMMENT LETTER 16

-2-

Consequences section that total removal will be stressful to the wild horses, resulting in significant death losses. That section further states:

"The reduction of 276 wild horses from the proposed management area would only leave an average of 30 wild horses in each of three allotments. Herds of 30 wild horses could be susceptible to total elimination during severe winters.

EIS at 149 (emphasis added). Reducing the size of the wild horse herds to the extent that they may become extinct is clearly not within the letter or the spirit of the statute.

ANPA also disputes the manner in which AUMs are computed. The determination that wild horses require 1.25 AUMs is arbitrary and without foundation. The National Environmental Policy Act, as well as Bureau of Land Management internal regulations require documentation for conclusory statements such as this. Moreover, ANPA has documented in court that wild horses do not need 1.25 AUMs and actually consume less than cattle. *ANPA v. Kleppe*, C.A. No. 76-1455, U.S. District Court for the District of Columbia. Thus a conclusion that wild horses require 1.25 AUMs and the subsequent computations based on this erroneous figure are without foundation. Since the basis upon which it was determined that 535 horses must be removed was wrong, the accuracy of the Draft EIS is seriously compromised.

All the Alternatives proposed by the EIS, except Alternatives A and D (D is clearly nonviable and is acknowledged to be in non-conformance with the Wild, Free-Roaming Horses and Burros Act) provide significantly greater quantities of AUMs for the wild horses. The only logical conclusion that can be drawn from this fact is that the Wild Horses have not overpopulated the range. Why is the Bureau proposing an 86% reduction in AUMs allocated to wild horses if the wild horse range is not overpopulated? The condition of the rangeland has not deteriorated to the extent that drastic reduction is demanded.

By the Bureau's own admission, 1,075,751 of the 1,521,806 acres are currently in fair to good condition. Certainly this is not a situation which requires substantial removal of the

* We note in passing that in computing the forage requirements of domestic horses, the BLM has treated them the same as cattle -- 1 AUM per animal. EIS, p. 88.

COMMENT LETTER 16

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wild horse herd to protect the long term quality of the rangeland. Rather, this proposal appears that this outrageous proposal is intended directly to benefit livestock. The unreasonable diminution of the wild horse population and the corresponding long term increase in livestock AUMs substantiate this conclusion.

ANPA is not suggesting that the Bureau ignore its responsibility to maintain and improve the quality of the rangeland. But protection of the rangeland to benefit the livestock at the expense of the wild horses is patently unreasonable. The sacrifice made for long term benefit of the range should be relative to the burden imposed. The wild horses have the right to roam their natural habitat with the least amount of intrusion. The burden they impose on the range is not proportionate to the proposed action to eradicate the alleged problems.

Alternative A is not a viable option. Alternative P, however, does provide a more reasonable middleground that accommodates the terrestrial wildlife, wild horses and livestock. Of consequence is the fact that while the AUMs for wild horses are not reduced, the projected longterm AUMs available for livestock are not significantly different than what is provided in Alternative A. This is clearly due to the fact that livestock are far and away the primary resource consumers in the White River area; cattle are currently allotted over 159,000 AUMs per year, while the horses consume less than 8,000 (under the more realistic 1 horse/1 AUM forage-use computation). Moreover, the cost of implementing Alternative P is approximately one half the cost of Alternative A.

Actually we find the cost of Alternative A, as delineated on p. 11, deceptive. To a large degree, the success of Alternative A in achieving productivity gains would depend on removal of the wild horses from the rangeland. Yet funds for the roundup and removal of the wild horses were not included in the cost analysis! As such, Alternative A would be significantly more expensive to implement than the EIS indicates. When this fact is coupled with the fact that the removal of the wild horses would be injurious to the maintenance of the natural ecological balance of the public lands, then it is painfully obvious that Alternative A is not an option worthy of serious consideration.

The fact that the costs of the wild horse removal plan were not included in the draft EIS brings us to the most serious defect in the draft. The draft makes it abundantly clear that the horses, their effect on the range, and the consequences of their removal are an integral part of the range management program. Consequently, any horse removal plan is part and parcel of the range program, and must be included in the EIS. Failure to do so violates the mandates of NEPA.

COMMENT LETTER 16

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In the final analysis, the role of the wild horses on the public lands has been dictated by Congress. Wild horses by virtue of the Wild, Free-Roaming Horses and Burros Act, have a preferred status in the multiple-use policy for public lands. Alternative A fails not only because this preferred status is ignored but also because the wild horses of the White River Resource Area have not been considered an integral part of the public lands. As such the Bureau has not even granted the wild horses a status of equal importance to that granted the domestic livestock using the public lands.

AJHPA has successfully challenged this practice in court and will continue to do so. It is arbitrary and capricious and flies in the face of the requirements of the Wild, Free-Roaming Horses and Burros Act and the National Environmental Policy Act. We hope that the Bureau of Land Management will abandon Alternative A and adopt a new policy that addresses the needs of the wild horses in the White River Resource Area and which meets the letter and spirit of the Wild, Free-Roaming Horses and Burros Act. We strongly suggest that the Bureau revise its EIS to include consideration of any proposed wild horse removal plan, so as to fulfill the requirements of NEPA.

Very truly yours,

MCCANDLESS & BARRITT

By

Joseph E. Schulz
Joseph E. Schulz

Attorneys for the American
Horse Protection Association

JES:ca
cc: Mrs. Joan Blue

RESPONSE TO COMMENT LETTER 16

Response to Comment Letter 16

American Horse Protection Association, McCandless & Barritt, attorneys

A. Wild horses are not indigenous to the western hemisphere and do not have any predators of consequence in the White River Resource Area. Historically, the wild horse population was controlled by area ranchers who rounded up horses for use as part of their operation. In 1971, the Wild and Free-Roaming Horses and Burros Act was passed, which prohibits these traditional roundups. Since this law's passage, the wild horse population in the Resource Area has grown from 165 to 625 head.

The Wild Horse and Burro Act of 1971 (Public Law 92-195) as amended by The Federal Land Policy and Management Act of 1976 (Public Law 94-579) and The Public Rangelands Improvement Act of 1978 (Public Law 95-616) states that "access animals . . . must be removed from an area in order to preserve and maintain a thriving natural ecological balance and multiple-use relationship in that area."

Due to their large size, hardiness, and the lack of natural predation, the wild horse population has increased even when wildlife populations have declined. During the severe winter of 1978-1979, the Pinaceous Beetle deer herd suffered a 44 percent winter kill, the elk herd was reduced by 15 percent (Colorado Division of Wildlife) while the wild horse herd had a typical winter loss. This demonstrated superior wintering ability of wild horses over deer and elk indicates that before winter loss curbs the wild horse population the deer and elk population would be greatly reduced. In addition, overgrazing by wild horses on Pasture C of Square B Allotment and Box Elder Allotment has caused serious degradation of the grass and forb undergrowth on ridgetops reducing the habitat quality for sage grouse nesting, brood rearing, and adult summering (CDOW, 1977 progress report).

Short term livestock grazing use would be reduced 30 percent below current levels on public lands for the entire Resource Area. Short term livestock grazing use on allotments in the wild horse use areas would be reduced by 35 percent below current actual levels (DRI, page 25). Additionally, authorized livestock grazing use (qualified use) on these allotments in the wild horse area would be reduced by 45 percent below that now authorized. An average of 15 percent of the livestock grazing use authorized in the wild horse areas has not been utilized, voluntarily by livestock operators, for the past five years.

The area of the proposed wild horse range was chosen because it has the most concentrated wild horse use (their preferred habitat), has reliable sources of water during late summer along the Cathedral Bluffs, and has a balance between summer and winter range. Fences are not presently a barrier to wild horse movements within this

RESPONSE TO COMMENT LETTER 16

range. Horses are able to move through natural livestock barriers and open gates between allotments. No new fences are to be constructed in this area and gates would be left open when livestock are not being grazed.

A total herd size of 90 to 140 would insure against total elimination during severe winters. This herd size would also provide a diverse genetic pool and help to prevent inbreeding (horses maintained a viable herd before 1971 with about the same number of horses spread over 443,979 acres).

The area west of Douglas Creek is within the Rangely Natural Gas Field. Extensive gas development has already taken place there with a projected surface disturbance of 7,795 acres in the next 5 years. Because their habitat has been, and would continue to be, disturbed with the development of drill pads, pipelines, roads and by a great increase in human activity, the wild horse population would be removed from this area. The disturbance which has occurred in this area has forced wild horses to expand into areas not previously occupied by wild horses. The projected development to take place in this area in the next five years would create further expansion of the wild horse range.

The remaining wild horse range proposed for total horse removal is north of the proposed wild horse range. Total removal has been proposed based on ecological factors. The area contains a large amount of critical deer winter range with horses competing with deer for space during winter. The area contains eight individual allotments which are entirely fenced or have natural barriers to both horses and livestock. Water is seasonally lacking (summer and fall) on these allotments, and wild horses have to migrate through open gates from winter range on the lower allotments to summer range on the higher allotments. Because of the small horse herd size, critical deer winter range, insufficient stable watering places, and inadequate summer range, this area was proposed for total wild horse removal.

The proposed removal of wild horses from 625 to between 90 and 140 head under Alternative A would reestablish the population at the approximate level it was when the Wild and Free-Roaming Horses and Burros Act was passed.

The western wild horse herds are of important aesthetic and historic value and should be protected and maintained in balance with the ecological parameters of their environment. If a balanced carrying capacity cannot be established on the wild horse range through planned removal of horses, the horse population would eventually be reduced by disease and starvation.

RESPONSE TO COMMENT LETTER 16

- B. The action proposal (Alternative A) was developed from multiple use recommendations made in the land use plan for the White River Resource Area. These multiple use recommendations were made after consideration of public input into the land use plan as directed by the Federal Land Policy and Management Act of 1976.

The environmental consequences shown in the DEIS are those that would result from implementing the multiple use recommendations. As noted in the Environmental Consequences section (DEIS, page 150), small bands of horses have in the past and could continue to suffer in the future from starvation during severe winters. However, it is also noted (DEIS, page 150) that the improved forage quantity and quality could lessen the chances of winter losses.

The horses that died in Pasture C of Square S Allotment (DEIS, page 149) were cut-off from their normal winter migration route by deep snow and thus trapped and unable to migrate to lower country because of the fences on the lower end of Pasture C. The same situation could occur again in Pasture T, however, the chances of this situation occurring in the other two allotments in the proposed wild horse range are not likely, because the other two allotments are not cross fenced and will not be cross fenced. The possibility of losing small bands of horses could continue, but total extinction of the entire horse herd is not likely.

- C. The vegetation allocation to various user groups (the principle issue of this RIS) provide forage for consumptive use of vegetation based upon the multiple use recommendations. The order of preference used in allocating vegetation in Alternative A was; first, watershed protection, vegetation improvement and small game and non-game wildlife which received 50 percent of the available vegetation; the remaining 50 percent was allocated to big game wildlife, wild horses, then livestock in that order.

In order to provide adequate forage supplies for the 140 wild horses recommended in the land use plan, forage consumption rates were determined for each class of animal. Forage consumption rates for horses was determined based upon the estimated average body weight for the wild horses in this area and daily dry matter intake required per unit of body weight using the requirements of domestic horses.

Average body weight for the wild horses in this area was estimated by local BLM personnel to be 1,000 to 1,100 pounds. Daily intake rates of forage for horses on a maintenance diet, based on the nutritional content and intake requirements for domestic horses of native range grasses in the wild horse area, would be 740 pounds (less than one AUM at 900 pounds) to 1,035 pounds (1.25 AUMs) of forage per month (National Academy of Sciences 1973). In addition, personal communication with Dr. Walt Conley of New Mexico State

RESPONSE TO COMMENT LETTER 16

University, who is knowledgeable of wild horse requirements, indicated 1.25 ADHs for wild horses in a good average to use in estimating the forage requirements of wild horses.

Providing 1.75 ADHs of forage per month per horse would provide an adequate amount of forage for the 140 horse level recommended in the land use plan. Monitoring studies to be conducted (DEIS, page 9) during and after implementation of each alternative would verify wild horse use levels and could be used to maintain the wild horse population (either increase or decrease) at a use level consistent with the 2,181 ADHs provided to wild horses in the long term.

- D. The alternatives described in this document are just that, alternatives. The amount of forage produced on the range is divided differently in each alternative among the various consumer animals. In each alternative, the total available forage that can be consumed while improving range condition is allocated. Relying between alternatives to come to the conclusion that there is significantly greater quantities of forage available for wild horses is an erroneous analysis.
- E. The use of condition and trend data for the entire resource area is not valid in analyzing resource conditions on the wild horse range. Vegetation within the 463,979 acre wild horse range is mostly in fair condition (378,875 acres) with 139,616 and 23,480 acres in poor and good condition respectively. Range trend is 57,321 acres declining, 373,165 acres static, and 13,493 acres improving.

Wild horses cannot be moved from one area to another like cattle. Horse bands tend to prefer the same sites and congregate on these areas. Sites receiving concentrated horse use are generally the areas that are in poor condition or in fair condition with a downward trend. Range management must be targeted to problem sites within each allotment before these problems spread to surrounding areas. Because of their wild free-ranging nature and habitat requirements, a relatively small population of horses on a large allotment with a limited amount of preferred wild horse habitat can severely overgraze these preferred sites.

The long term population level for wild horses used in Alternative A was based upon the multiple use recommendation made in the land use plan for the White River Resource Area. The long term increases in livestock grazing use are those that are expected to result from reduced livestock grazing use, reduced wild horse grazing use on allotments with wild horses, improved livestock grazing, management facilities, and vegetation manipulations.

- F. Refer to the responses to comments A, B, and D above for the rationale for the proposed reductions and management of wild horses.

RESPONSE TO COMMENT LETTER 16

- G. The projected long term ADHs available to livestock on allotments without wild horses would be the same under both Alternative A and Alternative F. However, the difference between alternatives would occur on the 14 allotments which have wild horses. The 14,481 ADH difference in Alternative A and F would have adverse impacts on the 15 livestock operations using these allotments.

The costs of implementing Alternative A and Alternative F excluding the costs of wild horse removals would be \$5,745,139 for Alternative A and \$5,220,195 for Alternative F, a 9 percent difference. Wild horse removals under Alternatives A and F would be \$318,010 and \$740,000 respectively. Total costs of implementing Alternatives A and F respectively would be \$6,063,149 and \$5,960,195, a 2 percent difference. (Refer to revised cost analysis.)

- H. The Final EIS has been revised to include the costs of wild horse removals under each alternative.
- I. The DEIS evaluated the impacts of the vegetation allocation and livestock management recommendations made in the land use plan and not the specific management plans (allotment management plans, wild horse management plans, wild horse removal plans, etc.) which are to be developed after the management decisions are made following approval of the Final EIS.

A removal plan for the Resource Area has been developed and will be implemented in August 1980 to remove 220 wild horses because of declining resource conditions. The removal plan was developed and will be implemented to reverse declining resource conditions. This removal plan has received a site specific EA which has been approved.

The removal plans which are to be developed or which have been developed will receive a site specific environmental assessment prior to implementation of each plan. This site specific environmental assessment procedure in each plan is in compliance of CBJ regulations and BHPA mandates.

- J. Refer to the responses in comments A, B, and D above.
- K. Refer to the response to comment I above.

COMMENT LETTER 17



COLORADO
CATTLEMEN'S
ASSOCIATION



SUITE 220 LIVESTOCK EXCHANGE BUILDING / DENVER, COLORADO 80216 / TELEPHONE 623-4347

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June 17, 1980

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Mr. Charles W. Lunscher
Acting Director, Colorado BLM
Room 700, Colorado State Bank Building
1600 Broadway
Denver, CO 80202

Dear Sir,

Enclosed are comments the Colorado Cattlemen's Association would like to submit on the Draft Environmental Impact Statements for the Gunnison and White River Resource Areas.

You will note in review of the comments that our chief concerns are the increased forage allocations to wildlife and the determination of trend range conditions. These specific concerns expressed in more detail in the comments for each respective resource area.

We appreciate the time and effort put forth by the Bureau of Land Management in Colorado and the project teams. For that effort, we commend you.

Also, we'd like to say thanks for your cooperation. It is indeed appreciated, and we look forward to the same in the future.

Sincerely,

David G. Rice, Jr.

David G. Rice, Jr.
Executive Vice-President

COMMENT LETTER 17



June 16, 1980

211 Livestock Exchange Building
Phone 623-6448
Denver, Colorado 80216

Mr. Charles W. Lunscher
Acting Director, Colorado BLM
Colorado State Bank Building
Room 700, 1600 Broadway
Denver, Colorado, 80202

Dear Mr. Lunscher:

The Colorado Wool Growers Association along with the Colorado Cattlemen's Association submit the enclosed comments on the Draft E.I.S. for the White River and Gunnison Basin Resource Areas.

These comments were reviewed by the C.G.A./C.W.G.A. Range Management Information Steering Committee. Of primary concern in each resource area is the allocation of vegetation between livestock and wildlife. There seems to be certain inconsistencies in these allocations that favor wildlife over livestock. We are in favor of a system that would adequately allocate forage between livestock and wildlife.

We would like to thank you for this opportunity to comment and we appreciate the cooperation and consideration you have given us now and in the past, and we look forward to this continued relationship.

Sincerely,

Edith Thues
Edith Thues
Public Lands Representative

Chris Joutfas
Chris Joutfas
President

COMMENT LETTER 17

THIS IS A STATEMENT PROPOSED AND SUBMITTED BY
the COLORADO CATTLEMAN'S ASSOCIATION and
ENDORSED BY THE
COLORADO CATTLEMAN'S ASSOCIATION/COLORADO WOOL GROWERS ASSOCIATION
RANGE MANAGEMENT INFORMATION STEERING COMMITTEE

We offer the following comments on the Draft Environmental Impact Statement on the White River Resource Area.

We feel the Bureau has satisfied the requirements of the NHDG suit in preparation of the statement.

We also commend the statement as it deals with the unique problems which are created by a wild horse population within a resource area. We feel the proposed reductions are definitely a must to insure a sound, positive range improvement program in these areas where horses have previously congregated.

We are also very concerned that livestock cuts are being proposed prior to actual use-data being collected. We feel it is imperative that adequate base line data be available before recommending or imposing a cut in livestock numbers or AUM's. We definitely oppose the use of "one time allotment survey's" to determine range condition and range carrying capacities. To make adequate determinations of these factors involves the use of past grazing history, trend plots, and utilization surveys conducted over a period of years.

Range improvements should be funded and put on the ground as quickly as possible to implement needed range management programs.

We feel that forage allocations between livestock and wildlife are not fairly being dealt with. Livestock numbers have already been allocated according to available forage during recent years. Now it seems that any further reductions are also being absorbed by the same livestock industry. The proposed action recommends a reduction of 27,000 AUM's livestock grazing, from 136,928 to 107,903 AUM's, while wildlife requirements are not reduced at all. We feel that the wildlife numbers should absorb their fair share of any proposed reductions in forage allocations, and should also have their numbers held consistent with the available winter range within the area. We also should remember that a major portion of

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wildlife winter range requirements are provided by private land.

Riparian habitat has been discussed at many, if not most, EIS hearings. We have observed several, if not all, of the areas of environmental concern on all the EIS areas for Colorado and know these have been over emphasized. First, riparian habitat has been incorrectly evaluated. It is not a climax community, but one subject to constant change; from extreme dry to flooding, from heavy use to non-use and from soil blowing to water born silt deposition. These changes or fluctuations in riparian habitat have not been livestock caused, but have occurred over time and will continue to do so no matter what the management or level of grazing. The impact of riparian habitat has not been properly stated in the EIS. Streambanks we have observed have not been excessively unstable. They are an ever occurring part of geologic erosion, most use observed was winter elk use of willow species and not domestic livestock trampling and overgrazing. We would urge everyone interested in public lands and riparian habitat to be aware of their unstable nature, that by their very nature they do erode, that there is cutting and silt deposition, that they range from very wet to very dry and that this is not necessarily livestock or big game use caused. It is just a natural phenomenon as was Mt. St. Helens!

BLM range has frequently received press coverage related to the large percentage in poor and fair condition. On questioning, it has been determined that this designation was given land that, by its very nature, was poorly suited to livestock grazing, not because it was ecologically considered to be in poor condition. There is a tremendous difference between these two. Poor condition ecologically is caused by too much grazing. Poor condition related to suitability for livestock grazing probably was always in this state and is not related to past livestock or game use. It is just poor range because of steep slopes, poorly developed soils, no water, or whatever the cause; but certainly not because of heavy livestock use or poor management. We will be much more sympathetic with the BLM when usage of range conditions descriptive terms are used as they were meant to be. When land has a limited production potential, state it as such; but when

COMMENT LETTER 17

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It is in poor condition because of past grazing use, either domestic or wildlife, also state that as much; but don't confuse the two by calling it all poor or fair conditions.

Apparent trend, whatever that means, has concerned us. Trend is a long term measurement of the improvement or decline in range condition. It cannot be measured with only one observation or visit to a site, but must be considered over time. Once again, we are aware of the time constraints ordered in the preparation of RIS's but, we have looked at land and are familiar with our own allotments and note that frequently trend has been designated as downward. This has to be short trend, because we all know that trend or improvement in condition has been primarily upward on almost all BLM land since the 1934 Taylor Grazing Act. We are also aware of the drought conditions existing in 1977-78 and feel these are responsible for the apparent downward trend expressed by recent RIS's. We feel that short term trend should be properly related to drought conditions that existed during the range inventory and not inferred as long term.

In summary, we submit the following comments:

1. We commend the BLM for their recommendations on the wild horse problem.
2. We object to reductions being made in livestock numbers which are based on range surveys that lack long term data to support these reductions. Any reductions must be verified by the use of trend plots and utilization survey's which are conducted over a number of years. This base line data will provide the information with which sound decisions can be made.
3. Range improvements need full and adequate funding.
4. We feel forage allocations between livestock and wildlife are not dealt with adequately. Livestock BLM's have taken recent reductions during forage allocation surveys and it is not time to take wildlife numbers into consideration. We should have necessary reductions in available forage allocations for wildlife which are consistent with a balance in Spring/Summer use and definitely correlated with available winter range requirements.

COMMENT LETTER 17

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5. Riparian Habitat has been inadequately dealt with.

Respectfully submitted by the Colorado Cattlemen's Association

RESPONSE TO COMMENT LETTER 17

Response to Comment Letter 17

Colorado Cattlemen's Association/Colorado Wool Grower's Association

- A. As noted on page 9 (DEIS), range surveys were used to estimate livestock grazing capacities, and forage production and utilization studies will be conducted during the three year livestock adjustment period in an effort to arrive at proper grazing capacities at the end of the three year period. In addition, these studies would continue on intensively managed units to evaluate and make necessary adjustments in that management.

- B. Refer to response to comment F of Comment Letter 22.

- C. The Federal Land Policy and Management Act of 1976 requires that uses on public lands be allocated through land use planning. Management recommendations developed through land use planning, on which this EIS is based, recommend that existing wildlife populations in the White River Resource Area be maintained by providing their required forage and habitat needs. Also, the land use plan recommends establishing studies that would determine the capacity of available winter ranges for deer and elk and maintaining deer and elk populations at existing levels until such studies are complete.

Public lands in the White River Resource Area support 59 percent of the elk populations which occur on winter ranges, 75 percent of the deer populations which occur on winter range, and 81 percent of the deer populations which occur on critical winter ranges (DEIS, pages 67, 69).

- D. Whether or not the riparian community is at climax is a debatable point that is inconsequential to the scope of the DEIS. The fact that the riparian community represents one of the most diverse ecosystems in the entire rangeland warrants its special treatment.

The fact that these communities do undergo change cannot be disputed, however, it is the judgement of many professionals who have studied this subject that some of the more dramatic changes are man-induced. It is certainly agreed that the climatic fluctuations play a large part in the changes that occur in riparian areas, however, to say that livestock play no part is incorrect. Riparian zones are desirable areas because of the availability of water, more palatable forage, amount of shade, and flatter, less rocky terrain. Livestock will naturally congregate in these areas unless water and forage are supplied elsewhere.

The statement that streambanks are not "excessively unstable" is also incorrect. Most streams in the EIS area flow through gullies that may have vertical walls as high as 30 feet. While "geologic erosion" is the process that maintains this state of instability, denuded streambanks caused by excessive use, agitates this instability to further deteriorate.

RESPONSE TO COMMENT LETTER 17

It is true that winter elk use of willows can be detrimental to riparian habitat. However, only one elk winter concentration area (along Minneret Creek) was found to overlap with riparian habitat in this EIS area. Inventories conducted by both BLM and Colorado DOW personnel found that almost all poor condition riparian habitat was in association with areas of heavy livestock use.

- K. Range condition as used in the draft EIS has been revised to reflect condition on lands suitable to livestock and on lands unsuitable to livestock.

Ecological condition analysis would require a survey of the area to determine the vegetation as compared to the potential vegetation the area could produce. Potential vegetation information was not available for the preparation of the EIS. For the White River EIS, information on range conditions for livestock grazing was available and therefore used as an analysis tool. In future EISs where data is adequate, the ecological condition will be determined.

- F. Only 13 percent of the public land acres are in a downward trend with 85 percent stable and 2 percent improving (DEIS, page 38). Trend measurements of approximately 16 percent of the public lands is long term trend, however, the remainder is short term or one point in time trend measurements taken during drought conditions (DEIS, page 303).

- G. Refer to responses to comments A through C above.

COMMENT LETTER 18



SOCIETY FOR RANGE MANAGEMENT

2876 Texas Ave., Grand Junction, CO 81501

COLORADO SECTION

May 30, 1980

B. Curtis Smith, Area Manager
USDI - Bureau of Land Management
P. O. Box 928
Meeker, Colorado 81641

Dear Curtis,

It has been my privilege as a Society for Range Management member to review the Draft Environmental Impact Statement for the proposed White River Resource Area Grazing Management Program.

You and your staff are to be commended on exploring all the various possibilities for the best of the total resources. I agree that Alternative A is the most preferred.

The A Alternative indeed covers the multiple use concept and allows for flexibility during implementation, which is good.

As the objectives of Alternative A are implemented, I am sure it will be for the good of the White River Resource Area.

Sincerely,

Harmon S. Hodgkinson
Harmon S. Hodgkinson

cc: Russ L. Campbell, Pres. Colorado Section
Floyd Kinsinger, Denver SRM Office



COMMENT LETTER 19



Wilderness Workshop
of the Colorado Open Space Council

2238 East Colfax Avenue, Denver, Colorado 80206 • (303) 399-5910

Marv Pearson, District Manager
Craig Bureau of Land Management
P.O. Box 248
450 Scurran St.
Craig, Colorado 81625

June 13, 1980

Dear Marv,

I am commenting on the White River Resource Area Grazing Management Draft Environmental Impact Statement (hereafter DEIS) for the Wilderness Workshop of the Colorado Open Space Council.

We are especially concerned with 2 aspects of the proposed alternative A:
1) The drastic reduction in the Wild Horse herd, as a result of the reduction in wildhorse range. We feel that such a reduction, of 75%, is unwarranted. Surely management objectives of providing cattle forage and maintaining the range are compatible with the preservation of the wildhorses. We urge that the selected alternative not eradicate the wildhorse herd.

2) All of the vegetative manipulations planned in the area, specifically in the WM's Proposed WSAs. Even though the DEIS states that practices not compatible with eventual Wilderness designation will not be allowed, excessively many support facilities and manipulations are proposed for the White River WSAs. We request that the cumulative impact of these projects be examined to determine their effect on Wilderness characteristics.

We are worried that, with grazing projects (stock ponds, springs, pipes, and wells) and vegetative manipulations covering the entire resource area, not enough lands will be spared the impacts of development, and be preserved in a natural condition. We therefore request that grazing developments and manipulations be limited in WSAs.

Thank you,

Norm Mallon
Norm Mallon, SRM Wilderness Coordinator
C.O.S.C. Wilderness Workshop
Colorado B.L.N. Wilderness Coalition

RESPONSE TO COMMENT LETTER 19

Response to Comment Letter 19

C.O.S.C. Wilderness Workshop

- A. See response to comment A of Comment Letter 16 (American Horse Protection Association).
- B. See response to comment C of Comment Letter 8 (Environmental Protection Agency).

COMMENT LETTER 20

June 16, 1960

Mr. B. Curtis Smith
USDI Bureau of Land Management
P.O. Box 926
Leesfer, Ohio 81641

Dear Mr. Smith:

This comment is in response to the Draft EIS of April 23, 1960 for the White River Resource Area.

As the alternatives are now written, more is completely satisfactory. With the exception of Alternative B, the first and forecast requirement is a further reduction of livestock AUM's. With the range improvements listed in Alternative A this would not be required and certainly not desirable for either the stockman or the community.

It is a demonstrated fact that sagebrush eradication increases the more desirable livestock and wildlife feed dramatically the first year with no requirement for non-use of the land prior to grazing. This was proven in the Square-S spraying program and in my own spraying program.

Chaining the Pinyon-Juniper areas is also a beneficial tool as reflected in both the EIS (page 59, col. 1, para. 6) and in practice in the Piceance Creek Area. A definite need for Chaining has been established due to the lack of fires (page 69, col. 1, para. 1).

The water developments are also a very beneficial tool for lessening the grazing impact around natural water by livestock, wildlife and wild horses. Overuse in the immediate areas bordering both natural and developed water (page 57, col. 2, para. 5), is a natural fact of life and will continue to be so regardless of the Alternative chosen. However, the more developed water there is, the less impact on any given area.

COMMENT LETTER 20

At the present allotment of AUM's, most range has been improving, not declining. This is especially true of the Fawn Creek Allotment #6024 and the Ryan Gulch Allotments # 6027 and 6028. As a very good example, refer to the picture on page 61 of the grassland type on Cathedral Bluffs. Fifteen years ago these same knobs were totally devoid of any grass and fine shale "drifts" were common. Now the hills are covered with grasses and forbes with the amount increasing each year.

The range surveys used as the basis for the classification of the range conditions were taken in drought years as is noted in the AFS. However, there is not one person on the staff of the AIS Team that has been in the area long enough to give the proper weight to the condition of the range due to drought, and to be able to see the dramatic improvement of the range over the past few decades.

If the wild horses were reduced in number and controlled at a reasonable level, the range would be able to improve even faster in the areas they inhabit. The destruction they are causing is very evident in the Wolf Ridge area. The need for control is admitted in the AIS (page 35, col. 2, para. 2) so the proper thing to do would be to implement controls before the numbers get completely out of hand. In Alternative F the optimum numbers of horses for that proposal is between 700 and 1,125. However, if the original 700 horses were allowed to increase unchecked, the resulting number of horses would be 2-3 times the maximum. It is time to be realistic about the wild horse population.

Alternative D, while it would seem to be the best for the Livestock Industry, could cause a backslam that would result in the total removal of all Livestock AUM's and maybe rightly so. The Livestock Industry no more deserves total use of BLM ground than do the hunters, hikers, wild horses, or other users. Multiple Use is an admitted concept of BLM ground.

Therefore, because of the way the Alternatives are drawn up, I would urge and cast my vote for the adoption of Alternative B, with the hope that range improvement for both livestock and wildlife be a possibility of the future.

Sincerely yours,

C. V. Brennan
C. V. Brennan

RESPONSE TO COMMENT LETTER 20

Response to Comment Letter 20

C. V. Brennan

- A. Reductions were based on available range survey data collected from 1941 to 1973, transect data in the 1977 drought year, and professional judgement. BLM realizes that better data was needed but was not available. Therefore, the three year monitoring program was proposed to verify the accuracy of the proposed reductions. No doubt the results will be variable as will the level of actual reductions. Range improvements proposed under Alternative A are expected to alleviate the magnitude of proposed reductions in many areas and, in some cases, help eliminate the need for reductions. However, improvements in some areas would be ineffective. The three year monitoring program, with gradual reductions over three years, and all management techniques proposed under Alternative A will identify problems and arrive at a solution that will minimize adverse impacts.
 - B. Sagebrush treatments are initially proposed on decadent sagebrush stands with little or no desirable understory production. In these areas, post-treatment rest for two years would be required to allow either for natural regeneration or for seedling establishment should the area be needed. Appendix A, page 234, paragraph 4 (D15) establishes this rest period but also states that grazing would be terminated until understory vegetation becomes well established. In the case of spraying more open sagebrush stands, the two year rest requirement may not be necessary.
 - C. Range condition and trend information in Appendix E, Table E-1 (D15, page 395) shows that only 2.8 percent (3,203 acres) of the total acreage of the three allotments mentioned is declining in trend and all of this acreage occurs on the Fawn Creek allotment (6024). Most of this declining acreage is due to poor livestock distribution. Fourteen water developments are proposed on the Fawn Creek allotment to help alleviate this problem.
- Unfortunately, range condition and trend data were taken at one point in time and not consistently over past decades. The proposed monitoring and studies programs will, hopefully, provide this information in the future and demonstrate the improvement which has been noted by ranchmen who have lived here for many years.
- D. Wild horse populations exceeding the maximum number of 1,125 under Alternative F would be removed as stated on page 24 under Alternative F - Optimize Wild Horses. Control of wild horse populations are also proposed under the other alternatives.

COMMENT LETTER 21

Bureau of Land Management
P.O. Box 328
Boulder, Colorado 80541

May 21, 1980

Re: Draft Environmental Impact Statement
White River Resource Area
 Grazing Management

This is a comment on the above to be considered with the public input for the Final Environmental Impact statement.

There is one alternative that is practical and keeps wild horses on their original range - Alt. "A"

Although you emphasize the similarity between Alt. "A" and "B" (similar costs and impact) your choice of title (Optimize Wild Horses) is very unfortunate, and I suspect not quite a coincidence. It will automatically turn off any rancher who may not have time to read it and compare it with Alt. "A".

How can you favor horses? Horses given preference over livestock in allocating vegetation? When cattle get 94,388 AUMs (more than horses)

Alt. "C" is of course a total loss; it provides no income for ranchers, requires time to pay for fencing. It would provide range improvement for the next acres, though. I do not wish to see cattle and sheep raised in confinement (factory farming) nor see the private land subdivided.

I do have questions: wasn't CHAINING prohibited by RFA? Doesn't chaining disturb wells and aquifers?

When you sell wood: what about the damage done by trucks, cutting and logging? You mention that aspen-shrub range takes ten years to recover in Colorado.

What happens if you get started on an alternative and Congress doesn't allocate enough funds to finish it?

Is there really a fence that "accommodates big game ... and ... ?" Has minimal impact on horse movement?

COMMENT LETTER 21

If "manipulating within the wild horse range will be greater" why will desirable species of vegetation flourish only in areas outside the wild horse range? (p.214)

If it is necessary to build 119 miles of fences "to improve livestock distribution" and these fences would increase deer mortality: could not enough gates be left open (p.231) along migratory routes after the cattle/sheep leave in the fall and closed after the deer spring migration?

All the proposed alternatives (except 'd nothing' C) represent a lot of manipulation. When the range is listed as in good condition, is it absolutely necessary?

That leads to the following inquiry: the present horse range is listed as fair (278,875 acres) poor 159,614 good (55,400). Assuming the wild horses are territorial the range is still predominantly FAIR. So why restrict the horses to 107,000 acres, such a small area for year-round use?

How do you explain the discrepancy in numbers of horses to be restricted on the 107,000 acres:

Alt. "A" = 90 - 140 heads

Alt. "B" = 52 heads

Alt. "C" = 416- 450 heads?

Even under Alt. "B" favorable to the wild horses you propose to remove 140 to 140 heads per year per area for four management areas" = 480 to 560 heads every four years, while today's population you estimate at 625 heads. Such an increase in the horse population must be guess work. How do you explain that the wild horses population has remained stable in A and B, Square 8 allotment since 1974? (p.171). Unless there are illegal round-ups.

Another mystery: Alt. "C" which would eliminate cattle, provides for 500 heads of wild horses (p.181). Alt. "B" WITH cattle allotments is to support 700 - 1,125 heads of horses!

Removal of wild horses is a touchy subject. As you admit, death rates from accidents may exceed the 3 percent at Douglas Mountain.

The cropping you suggest would theoretically place 30 heads of horses in each allotment. If 20 died (as did in pasture C, Square 8 78/79 (p.149)) ten horses would not be a viable population assuming the dead would be the old and very young. Removal will disrupt bands; how can you assure that the 30 horses per allotment are not a group of bachelors, or mares with foals without a dominant stud? Or just odds and ends of unrelated individuals not compatible to form a cohesive society?

COMMENT LETTER 21

As to horses crossing over to avoid inbreeding - it doesn't seem likely that they travel far if pastures A and B in Square B were grazed to allow capacity and in pasture C horses started to die. Unless there are unsurmountable physical obstacles between these areas.

I am definitely in favor of keeping the wild herds on their original 443,979 acres, inasmuch as in Alt. "F" you state that "Optimizing wild horses would be a first other resource uses". Even Nevada when recommending reduction in horse populations it does NOT include reducing the horse range.

With this specification, a compromise could be reached between your preferred Alt. "A" and Alt. "F". Income from game is the same, range improvement varies by +164,000 acres, initial cost for "F" would be less by \$284,964 and yearly maintenance would be reduced by \$37,222.

As to Alt. "G" the "Other Resources" would not benefit horses, nor livestock and would still limit the horses to that original number of 107,000 acres.

Alt. "B" in favor of livestock is too far out. The differences in AUMs for horses (-1,304) and for game (deer -194, 4, elk -554 and antelope -534) does NOT correspond to the "multiple use concept".

Again, I do not wish to "run the ranchers out of business"; but I DO want the wild horses to get a fair shake on their full range they are enjoying today.

Sincerely yours,

George Leighton

George Leighton
Box 1431
Aspen, CO 81611

RESPONSE TO COMMENT LETTER 21

Response to Comment Letter 21

George Leighton

- A. Alternative F would favor horses by allowing the herd size to increase to 700 to 1,125 head and by allocating sufficient forage for this increase.
 - B. Plymou-jumper chaining has not been prohibited and still remains as a tool available to the land manager to increase grass and browse production. Studies conducted before and after chaining show no significant change in runoff from the site, which should have little effect on underground water supplies.
 - C. Presently, wood cutting in the plymou-jumper is restricted to dry soil conditions and would continue. Damage by trucks during dry soil conditions has only minor impacts on soil disturbance. Maintain shrub and aspen ranges can take 10 years to improve from fair to good condition (DEIS, page 132).
 - D. Refer to response to comment F of Comment Letter 22.
 - E. No fences would be constructed inside areas that would remain as wild horse range except under Alternative D (Optimize Livestock Grazing). Fences constructed within the remaining wild horse range, should Alternative D be implemented, would be designed to have the least impact on wild horse movements (DEIS, page 31).
- All fences proposed under any alternative would be constructed in accordance with big game wildlife requirements as detailed in BLM Manual 1737 (DEIS, page 234).
- F. Alternative F would increase the horse population within the wild horse range to 700 to 1,125 head. The increased grazing use by horses on a continuous basis and continued livestock grazing use (which would be decreased below existing levels) during the authorized grazing period, would limit the increase in desirable species by not allowing these plants the necessary amount of rest during critical growth periods (DEIS, page 212). The increase in desirable species would be less than the increase on areas outside the wild horse range (DEIS, page 214).
 - G. In order to implement intensive livestock grazing management and provide required rest periods for desirable vegetation, fences would be required for livestock control. The 119 miles of fence proposed is an estimate which could be reduced after development of allotment management plans.

RESPONSE TO COMMENT LETTER 21

A site-specific environmental assessment would be conducted for each fence prior to construction. Areas of heavy big game wildlife migration would be identified and modifications made to the fence design to mitigate any adverse effects which would hamper wildlife migration. Some design changes could include deer gates, let-down fences, reduced fence height, three-wire fence instead of four-wire and not fencing on steep slopes or areas of drifting snow (BLM Manual 1737).

- H. Existing range conditions are: 446,055 acres poor, 996,762 acres fair, and 79,009 acres good. Much of the manipulation (111,137 acres) would occur on poor and low fair condition sagebrush and mountain shrub rangeland which have a higher composition of shrubs than occurs on ranges in good condition. Manipulation of these ranges would shorten the time required to attain good condition ranges than under improved livestock management alone. Production of desirable vegetation would also be increased in a shorter period.

- I. Refer to the response to comment A of Comment Letter 16.

- J. The wild horse range in the WSEA produces a limited amount of forage that is divided between various consumer animals. Each alternative allocates forage favoring one consumer group at the expense of another. This accounts for the variation in horse numbers between alternatives.

The 107,000 acre figure in the DEIS is an error and should be 148,137 acres.

- K. The wild horse population within the WSEA has not remained stable but has increased each year since the passage of the Wild and Free-Roaming Horses and Burros Act in 1971. The wild horse population on the lower pastures of the Square 5 Allotment have probably remained stable because horses move out to more preferred areas.

The proposed removal of 120-140 head of horses a year in Alternative F is planned to maintain the number of horses between 750 and 1,125 head. The actual number removed would be adjusted by the actual increase in the wild horse population.

- L. Alternative C would provide forage for 500 to 750 wild horses. One of the primary objectives of this alternative is to maximize soil and watershed protection by improving the vegetation resource and by allowing wildlife and wild horses to reach a balance with available forage production.

The wild horse population, which would be in balance with forage production, was estimated by range and wild horse specialists based on existing inventory data available (range surveys). That population which would allow for the desired vegetation improvements was estimated at 750 horses.

RESPONSE TO COMMENT LETTER 21

No range improvements would be developed under Alternative C. The range improvements that would be developed under Alternative F would provide increased watering facilities and increased forage production through vegetation manipulations, which would provide for both the livestock use and the wild horse use estimated in Alternative F.

- M. Based on previous experience in the Craig District, our predicted death loss from roundups is 3 percent. The 3 percent prediction is only applicable to total removal of horses from an area. Total removal of horses during the Douglas Mountain roundup resulted in less than a 3 percent death loss even though inexperienced personnel were involved. In the partial removal of wild horses at Sand Wash, no horses were killed or had to be destroyed because of the removal operation. In fact, only one horse required veterinary care for a cut.

The possibility exists that some horses could be lost, but we feel this to be unlikely.

- N. These horses died from a combination of factors which the proposed wild horse management is designed to avoid. Pasture C of the Square 5 Allotment was severely overgrazed on ridgetops by 116 wild horses. Horses can move out of this pasture to the west, but the north, south, and east are controlled by fences. Deep snow and cold weather trapped horses that did not migrate to lower country. The combination of snow, cold, and lack of feed resulted in the death of the weaker horses.

Refer to the response to comment A of Comment Letter 15.

Presently, wild horses roam in small bands. When horses are removed, they would be gathered by these small bands. The horses that would remain on the range would be small existing bands of horses not gathered.

- O. Refer to the responses to comments K and L above.

- P. Refer to the response to comment A of Comment Letter 16.

COMMENT LETTER 22

June 16, 1980

Department of the Interior
Bureau of Land Management
Colorado State Office
Denver, Colorado 80202

re: CO-922
1792 (1804)

Comments on
Draft Environmental Impact Statement
White River Resource Area

by
David D. Robertson

I would like to make the following comments on the above named document:

A. There is data used in the development of this writing which is out-dated and therefore, does not reflect present day facts. (E.g. Old resource surveys). In my opinion, there should be a qualifying statement in the final draft to alert the reader that some of the information is not current and therefore, does not present an accurate assessment of the facts. A three year study to determine up-to-date facts should be mandated in the final draft.

B. Information was taken from the grazing permit and resource license for a period of years in the mid 1970's. The document apparently was compiled under the premise that, if the actual use was less than the permitted use during this time, then the actual use must be the capacity of that permit. Two items of major importance paralleled this period of time:

1. A period of drought conditions and
2. The down slide of the economic cycle in the cattle industry.

These two items were apparently not considered as a logical reason that active use was less than permitted use. The three year study should be completed before adjustments in numbers are initiated.

A close evaluation of any allotment in the area under consideration will eternally show areas of extreme use and also areas with very slight or no use. There is a reason for this situation in every instance. (E.g. lack of adequate watering facilities) If some mitigative measures were taken to gain more uniform utilization of the forage at the same time a three year study is being conducted, then in many instances, there may be no need for the drastic reductions indicated in the document.

COMMENT LETTER 22

D. The Bureau of Land Management should conduct ongoing studies of the big game habitat in the area under consideration. It should have current information independent of Colorado Division of Wildlife in order to make good decisions on the public lands. Also, I feel there should be more study on the dietary overlap between deer, elk and domestic livestock within the area under consideration.

E. Hopefully, this document will satisfy the wishes of all interested persons so that the real business of range management can be attended to by the BLM personnel. I feel the personnel who develop and write the Allotment Management Plans should be retained on through the implementation phase and continue through a period of years of practice and evaluation. The justification being that most of the BLM personnel are young and, in order to develop, they need to be associated with the allotments right on through implementation and practice of the plan.

F. In managing the public lands there will have to be money spent to accomplish the goals and objectives set forth. However, I seriously doubt that the funds required to implement the various Allotment Management Plans will ever be made available. Funding of token projects and a few significant projects will probably be the size of the development work. The permittees will, as before, be asked if they can accomplish the balance of the development because there is no BLM money available. Now, I ask this question: How can a permittee cut his production by one fourth to give half, pay rising costs due to inflation, make principal payments on his debt and still have funds to spend on his permit?

G. The area being considered here is also a mineral rich area. Livestock grazing and mineral development are generally considered compatible. However, it appears that the USFS can override the BLM on surface use. (E.g. Drill sites could be placed on rocky ridge tops in many instances. Instead they are being located in the more productive bottom lands with no attempt to mitigate that impact on other resources.) In my opinion, the Congress should analyze the authorities of each agency and determine which agency has final say with respect to the land surface.

Respectfully submitted,

David D. Robertson
David D. Robertson
Box 323
Boulder, Colorado 80508

RESPONSE TO COMMENT LETTER 22

Response to Comment Letter 22

David B. Robertson

- A. BLM recognizes that the data from range surveys conducted prior to 1965 are not as current as is desired, especially when the data is the basis upon which livestock use adjustments are determined. However, this was the only data available at the initiation of this EIS. To verify the accuracy of conclusions drawn from this data, a three year monitoring program (DEIS, page 9) is proposed to attain a better estimate of forage conditions as they presently exist and make more accurate adjustments in livestock use.

Qualifying statements as to the age of the range surveys (DEIS, pages 9, 281) and the fact that analysts use based upon existing data (DEIS, page 125) are mentioned in the DEIS. It should be noted, however, that this existing data was used as a baseline, and that adjustments were made to this data, when it did not reflect the present situation, by local BLM personnel who were familiar with current conditions (1978).

- B. Actual use data was used as a baseline guide from which to compare results of survey data and determine normal use as influenced by drought, economic and other conditions. However, non-use taken due to drought conditions was excluded from actual use calculations since more drought occurred during the five year sample period than would normally occur over a larger period of time.

Also, actual use was not established as the absolute maximum use that would be allowed. Management guidelines allow for increases or decreases from actual use if data from monitoring and study programs indicate which changes in use are warranted (DEIS, page 9).

Actual use, as used in the DEIS, is average licensed active use and was used in the DEIS to determine socio-economic impacts of each alternative considered.

- C. Allotment management plans for all EIS area allotments proposed for intensive management are scheduled to be completed over a five year period. As ANPs are written, improvements would be gradually installed over an eight year period. The monitoring and studies program will be carried out over three years to verify the accuracy of initially proposed adjustments. Monitoring and studies will be continued after the three year period to determine the effects improvements have on distribution until all improvements and management plans are installed. The entire process will be one of gradual implementation while monitoring the interim and final effectiveness of proposed management. Proposed livestock adjustments under present Bureau policy, are to be scheduled over a three year period with the possibility, now under consideration by the Bureau, of adjustments being scheduled over a five year period.

RESPONSE TO COMMENT LETTER 22

- D. Habitat monitoring studies would be developed concurrently with ANP monitoring studies on allotments having big game wildlife use (DEIS, page 9). Data collected from these studies would be used in land use decisions and recommendations to Colorado DOW on wildlife adjustments.
- E. Presently, it is not Bureau policy to encourage employees to spend a considerable period of time at any one duty station. By systematically developing ANPs, monitoring studies, and flexible grazing management, results will be documented for the BLM personnel who succeed those who developed the plans.
- F. BLM cannot be assured of receiving the funds required to completely implement the proposal or even a portion of it. With the commitment of improving public rangelands as evidenced by the "Public Rangeland Improvement Act of 1978" and by the improvements taking place in other Resource Areas after approval of their final EIS, there is a strong possibility of completing a substantial portion of the proposal.

The permittees will be encouraged to contribute to the proposed range improvements on their allotments either through development or maintenance of these improvements.

The Bureau's first and foremost responsibility is to improve or maintain an acceptable rangeland condition and to adjust vegetation uses to a sustained yield of that vegetation. The ANPs to be developed will include stages of development which will correspond to the intensity of livestock management. In most cases, water and fences would have to be developed and operable before the grazing management proposed can be fully implemented. Without the required range improvements, management under that ANP would have to be at a level commensurate with the available range improvements and the sustained yield of forage.

- G. The effects of mineral development on rangeland management was not considered as being within the scope of this EIS. However, each drill site or location must be covered by a site specific environmental assessment. Each environmental assessment must address all adverse impacts and appropriate mitigation. The environmental assessment for each drill site is on file as public documents with the U.S. Geological Survey.

COMMENT LETTER 23

I have the following comments to make on the DEIS for the White River Resource Area:

I protest any alternative plan that decreases AIM's for livestock. I notice that the REM has no jurisdiction over big game wildlife numbers. All they can do is "recommend".

In a time of recession and depression, the consuming public will be ill served by any action that causes food and fiber to become scarce or non-existent.

The land needs to be taken care of. So does the livestock industry. In the event of food shortages and/or famine, I doubt that the consumer will be too elated to know how many more hunter-recreation days have been created by curtailing or eliminating livestock in favor of wildlife.

When the public can no longer buy beef or leather products, lamb or wool shirts, blankets or carpets, will they applaud the REM for giving wild horses and burros exclusive grazing rights to the public lands?

Even a 20% cut in numbers is far from nominal. In a small operation it means the difference between a viable and a non-viable business.

The private land owners have subsidized the big game wild life for as many years as they have owned property. Perhaps the Division of Wildlife should begin paying grazing fees to the farmer and rancher. Especially, if the livestock had to be removed or the numbers greatly reduced while the big game wildlife numbers can remain the same or even be increased at the option of the DOW.

The economic projections are very short sighted. You list the individual rancher and whatever impact might occur locally. You overlook the adverse effects on feedlots, packing plants, woolen mills, grocery stores, clothing stores and the American consumer.

It isn't enough to be in a bind for oil! We now have to destroy our domestic production of food and fiber.

The livestock business pays its own way in grazing fees and cooperative agreements on range improvements. How much does the DOW contribute for grazing fees and range improvement? How much more of a tax burden is going to be assessed to the American people for the extra ten REM personnel and the miles and miles of fences and vegetation manipulation and water projects and maintenance thereof?

I should imagine the bits and pieces of State land and private land inside REM boundaries should be paid for in AIM's and lease money as fencing costs would be prohibitive.

I notice that should the livestock be phased out and fenced out that the land owner would have the entire cost of fencing and maintenance of the fences. I suggest that the fences be so constructed as to keep the big game wildlife, wild horses and wild burros within the public land and that the cost should be shared equally by the REM.

Sincerely,

Reda L. Wyman

RESPONSE TO COMMENT LETTER 23

Response to Comment Letter 23

Veda L. Wyman

- A. Alternative C (elimination of livestock grazing on public lands) and Alternative E (wildlife and watershed optimization) are the only alternatives which could have adverse effects on production of domestic food and fiber. Short term livestock reductions under Alternative A (action proposal) and Alternative F (wild horse optimization) would probably have minor impacts on food and fiber production outside the EIS area (refer to response to comment D below). Long term projections in the draft EIS show either a maintenance or increase in existing livestock use levels on public lands in the EIS area under all alternatives except Alternative C and Alternative E.
- B. Refer to responses to comments A and B of Comment Letter 11.
- C. Refer to response to comment C of Comment Letter 17.
- D. The economic analysis focused on the local economy (EIS area economy) because most of the impacts would occur there. As noted in the DEIS, page 87, public lands (BLM) provide 0.4 percent of the forage needs for the livestock industry in Colorado and 0.05 percent of the forage needs of the industry in the eleven western states. It is believed that changes in livestock grazing levels described in each alternative would have only minor impacts on industries outside of the EIS area. It is possible that elimination of livestock grazing on public lands would have short term adverse impacts on these industries, however, the supply of livestock products would be replaced during the short term from sources other than public lands in the EIS area.
- E. Refer to responses to comments A and D above.
- F. Wildlife are an integral part of public lands and as such are considered as one of the primary uses on public lands with that use allocated and provided for through land use planning on a multiple use concept (The Federal Land Policy and Management Act of 1976). Wildlife, being an integral part of the public lands, is exempt from grazing fees.

The estimated costs of implementing the range improvements proposed in each alternative are presented in Section 2, Description of the Alternatives of the DEIS. The cost of the estimated additional personnel in each alternative would be approximately \$30,000 per year per position.

RESPONSE TO COMMENT LETTER 23

G. If management decisions, to be made after approval of the Final RIS, require exclusion of livestock grazing on all or parts of the public lands, then livestock grazing use that occurs on private or State lands adjoining public lands would have to be done in a manner which would keep livestock off public lands. This control of livestock would have to be undertaken by the livestock owner at his expense. BLM would share the cost of fencing in cases where exclusion would benefit a resource use other than livestock grazing. However, if fencing would only benefit the livestock operator in enabling the use of private or State lands for livestock grazing, then the expense would be born by the livestock operator or adjoining land owner.

ORAL TESTIMONY 1

1 again at 7:00 p.m. this evening. So, if you would tell anybody
2 that might be interested in making comments that just doesn't
3 know about the hearing, it would be appreciated.

4 Copies of the transcript of this hearing can be
5 obtained by making arrangements with the reporter. In addition,
6 copies of the transcript and copies of all written statements
7 can be obtained from the Colorado State Office, Bureau of Land
8 Management. There will be a nominal -- it says nominal; I think
9 a little more than that -- a nominal charge for copies.

10 As of now I only have one speaker on my list and he
11 is Mr. Nick Theos, who I understand is a member of the Colorado
12 State Legislature. Mr. Theos, please.

13 NICK THEOS: Thank you. I made some rough copies here
14 There are only three of them, but you can kind of follow them
15 through. I would like to submit that for the record, if I may,
16 and when I get the time I might even go over it again and
17 submit a little additional testimony.

18 JUDGE HALE: Yes, surely. Understood.

19 NICK THEOS: Thank you. And my name is Nick Theos.
20 I'm a rancher and a sheepman and I reside in Meeker, Colorado.
21 I've been a permittee on BLM and Forest Service land for a good
22 many years in both Colorado and Utah. I am a past President of
23 the Public Lands Council, which is an organization made up of
24 livestock permittees in the thirteen western states and it is
25 financed by these permittees.

ORAL TESTIMONY 1

6

1 Then I've also been a past President of the Colorado
2 Wool Growers. And I've served on local RLM advisory boards in
3 both Colorado and Utah for over 30 years. I've also served on
4 the Colorado State RLM Multiple Use Board and I was Chairman of
5 that Board for a number of years.

6 I was also a member of the National Advisory Board
7 for many years.

8 Therefore, I feel real qualified to speak to you here
9 today.

10 At the present time I'm serving on the local district
11 boards here in Colorado, District 1, and District 8 in Utah, and
12 I'm Co-chairman of the Colorado Steering Committee that it is
13 made up of. I represent the Colorado Wool Growers on it, and
14 the Colorado Cattlemen are represented on there, and the RLM
15 personnel. This Steering Committee is a committee that is kind
16 of a steering committee and looks at permits and goes over these
17 EIS's, and so forth. We've been on a tour the last two days
18 here in this District.

19 I am also Chairman of the Public Lands Committee for the
20 Colorado Wool Growers and the National Wool Growers at the
21 present time and, of course, the State Legislature for this
22 District.

23 I am here to present comment on behalf of the Colorado
24 Wool Growers and the permittees in this District. I want to
25 apologize that no more than what is here are here, but this is

ORAL TESTIMONY 1

7

1 a real busy time of the year, one of the worst, and the busiest
2 time that we could have these hearings. When the statement was
3 put out, it was put out -- I think the 1st of May I received
4 mine; the biggest time the sheepmen have got the year around.

5 So, I do want to apologize that I haven't read the
6 statement clear through, but I've read a lot of other ones and
7 they're all the same. I've testified on about four other
8 statements. I've testified on the first one, the Chato one,
9 and I read that one word for word. And, so, I want to apologize
10 that I haven't read it.

11 And I'm not going to comment on it page by page, or
12 paragraph by paragraph, or permittee by permittee, as outlined
13 there.

14 First I was going to ask for an extension of time,
15 but I do realize the RLM is under a time constraint and the
16 sooner we get these EIS's out of the way, the better off we all
17 will be and we can go on and spend some money in improving
18 the ranges. That's why I decided against that decision.

19 Now, I'll try to send in, like I stated before,
20 further written comments if I get time to read the statement,
21 and the Colorado Cattlemen's Association informed me that they
22 will do the same. They couldn't be here today and they wanted
23 me to apologize for them.

24 The people that I represent can't accept the draft as
25 it is written, for the following reasons:

ORAL TESTIMONY 1

1 The proposed action calls for a large reduction, about
2 30 percent overall. This will work a hardship on a lot of the
3 permittees, because a lot of them are borrowing money, they are
4 paying high interest rates at this time, and if you reduce them
5 by 30, 40, or 60 percent you will put them out of business.

6 The alternatives that are on there calls for a three-
7 year study on down the line and a possible increase. This could
8 or could not happen, depending on who is here at that time.

9 This document has been written, the way I see it and
10 the way the rest of them have been written, to satisfy the court,
11 the judges, and the CEO, and not for the betterment of ranges
12 and the livestock industry, which to me is a necessity for the
13 welfare of this country in years to come. Shortage of food and
14 fiber will become a bigger factor than energy ever did, and if
15 you think the gas lines were bad, wait until you have food lines
16 and people can't go to the store and buy meat when they want it.

17 This statement has been started with a negative
18 aspect, rather than a positive one. And the 1976, I think I'm
19 right on that, the 1978 date that you used, Curt, I've got a
20 question mark there.

21 CURT SMITH: The data on that was 1976 and 1977 for
22 the condition trend.

23 NICK THEOS: Anyway, those were the driest years we
24 had. And I want that emphasized in that draft, that it is the
25 driest years. You guys took that data at the worst years you

ORAL TESTIMONY 1

1 possibly could get it.

2 And, number five, the words "poor and declining
3 condition" that you've used on part near every allotment, and
4 some allotments you've used the "poor condition of 100 percent
5 of the allotment," 100 percent of the acreage. There is no one
6 here that knows this district better than I do. I've been here
7 for 30 years. I've been on practically every permit, and I was
8 there during the dry '30s. There is no justification for the
9 language that you've used on that document. These allotments
10 are all in better condition, and even the worst ones have been
11 improved by 50 percent.

12 And since I've been on the advisory board for a good
13 many years and at that time the advisory boards -- and I was
14 chairman of this advisory board in District 1 for a good many
15 years -- we would act on each and every permit every year, and if
16 we thought that the range couldn't stand it, we would reduce it,
17 and ask the permittee to take a non-use or whatever, and it
18 was agreeable.

19 I think it was 18 years ago we went down here and took
20 a survey and a study and whatever you want to call it, and most
21 of the permittees took a 15 percent outright reduction. A lot
22 of them took 50 percent of the number that were allotted in the
23 priority years. And then after that a lot of them have been
24 taking a substantial suspended non-use, and they're still taking
25 it.

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10

1 This document discredits the BLM personnel and the
2 advisory board which I was a member of for a good many years.
3 It discredits the range managers. We believe that the trend and
4 range conditions described in this EIS should have been different,
5 should have been the positive nature rather than the negative.

6 If we believe these, then millions of dollars have
7 been wasted on wages paying the District Managers. Money has
8 been spent on range improvement, reseeding, spraying the sage
9 brush, building water ponds, water wells, and so on; all that
10 has been wasted, according to the document. You haven't done
11 anything, because the trend shows it is in a declining condition.

12 And a little bit of it, sometimes you say it is on a
13 static condition, none of it is improving.

14 If I was in Congress today and you came up with a
15 statement like that, I think I would take away what money we
16 were paying the BLM, rather than give you more money.

17 I think it would be a lot better for this document to
18 be on a positive rather than a negative nature.

19 When you allocate for wildlife -- and as I said before
20 a lot of people took a 15 percent reduction in those years --
21 wildlife, because it was there, and in priority years there
22 wasn't any game animals in the lower country, but as the range
23 has improved, and this is the trend that I have seen since the
24 Taylor Grazing Act went into effect, the ranges have improved
25 on there and deer have moved down there. Now the elk are moving

ORAL TESTIMONY 1

11

1 down there. And I don't think that a permittee should be
2 penalized and reduced in numbers just because he has built his
3 range up and these game animals are moving in there.

4 And you've got to consider that the more game animals
5 you put on these allotments and you reduce the livestock numbers
6 that you are putting more pressure on private land. These game
7 animals have to share those private lands. That's where their
8 habitat is. In this area especially, if it wasn't for the
9 private lands you wouldn't have a game herd, because they use
10 that as their intermediate range.

11 The rest periods that you've mentioned as an
12 alternative, we can't accept that. We sure can't accept the
13 date you've got on there of March 15. There is nobody in this
14 room or in this area that has seen anything grow in District 1
15 in the White River Drainage by March 15. It isn't during the
16 growing period. So, resting it from March 15 until April 15
17 will not do the range any bit of good. It will just work a
18 hardship on the permittees.

19 I would rather use the words "deferred grazing," if
20 you may, in certain parts of the year. And I want that to be
21 real flexible.

22 One other thing that I would like to say, even though
23 the White River and Victory trails are mentioned in the document,
24 I would like to say that these two historic stock driveways
25 should be preserved and given a high priority. I think the

ORAL TESTIMONY 1

12

1 stock driveways in years to come will be just as important as
2 an Indian marking or whatever. People like to see them. In
3 fact, this year Channel 2 out of Denver wanted to come over and
4 take pictures of trailing sheep up through the White River Trail.

5 To summarize the above, I guess, as a summary, I would
6 say we ought to look at more long range data on utilization and
7 trend and actual use before any drastic action is taken.

8 And another thing, what do we compare? What is the
9 comparison of poor, good, or bad, or the trends essentially?

10 It is just like I said the other day, the guy asked the other
11 guy, "How is your wife?" And he said, "Compared to whose?"
12 Well, it's the same way with that. What do you compare the
13 trend with?

14 I think there's nobody in this room that can say, or
15 in this whole district, regardless of how much of a preservationist
16 they are, that their ranges have deteriorated.

17 The allocation of vegetation between wildlife and
18 livestock, as I said before, should be done on an equitable basis
19 and consideration be given to private lands.

20 There should be positive language used on this, instead
21 of the negative language that is used on the document, and credit
22 should be given to the BLM personnel for the good work they've
23 done in managing and bringing these ranges back since the Taylor
24 Grazing Act went into effect.

25 Again, I want to thank you for this opportunity. And

ORAL TESTIMONY 1

13

1 I want to apologize for more permittees not being here. I'm
2 sure they would be, but when they've got a mouthpiece like me,
3 they let me take care of all of their problems.

4 Thank you.

5 JUDGE HALE: Thank you, Mr. Theos.

6 NICK THEOS: If you've got any questions, I'll be glad
7 to answer them. Dave, you said you had a fistful?

8 DAVID WALTER: Just about how long are you going to
9 take. Thank you, Nick.

10 JUDGE HALE: Our next speaker is Mr. Gus R. Halandras.

11 GUS R. HALANDRAS: Mr. Chairman, Curt, employees of
12 the Interior Department, and concerned citizens.

13 I really came here as a listener. I had no intention
14 of speaking. However, I wish to repeat what Nick has said and
15 add a few comments of my own that I think might be appropriate.

16 My name is Gus Halandras. I live in Meeker; born
17 here; rancher and educator, businessman; and I'm also a permittee.
18 My brother and I operate a viable sheep ranch. We feel it is
19 among the better ones in the area, because we love what we're
20 doing and we love what we have.

21 Since we are here specifically to talk about your
22 draft, let me get down to that. I am kind of like Nick: I
23 feel that maybe the room is not full of concerned citizens not
24 only because they are busy, but because maybe they've given up.
25 It is almost impossible to fight city hall any more, and you're

RESPONSE TO ORAL TESTIMONY 1

Response to Oral Testimony 1

Nick Thomas

- A. BLM policy mandates that these studies are to be conducted, and that the results of these studies are to be documented and utilized in adjusting uses of public lands.
- B. This EIS was written in response to NREDC's suit against the BLM. The primary objective was and is to improve rangeland conditions.
- C. The prevailing drought conditions of 1976-1977 were taken into consideration when condition and trend data were analyzed for this DEIS (Appendix G). The fact that data were collected during this period was due to planning schedules developed several years previously. It is acknowledged that the drought influenced these findings and as such, we have proposed condition, trend and utilization studies to verify current conditions during years with normal precipitation.
- D. Refer to response to comment E of Comment Letter 17.
- E. The range surveys conducted between 1941 and 1973 were used as the baseline data for the vegetation inventory. Since the time that the surveys were originally conducted, and livestock adjustments made, proper use levels of forage species allowed for the original survey have been modified by changes in livestock periods of use from the original periods of use, and by updates to proper use levels based on research of and experience in plant tolerance and palatability.

The amount of suspended ungulate (inactive qualifications) presently authorized is 1,600 ADUs for the entire Resource Area, not a substantial amount.
- F. Refer to response to comment C of Comment Letter 20.
- G. Improvements constructed in the past have not been enough, judging from requests we are currently receiving from permittees for more range improvements.
- H. The DEIS indicates that ranges are currently improving in many areas (DEIS, Table 3-5 and Appendix E, Table E-1).
- I. This document is positive, in that future projections indicate improvement in rangeland conditions.
- J. Refer to response to comment C of Comment Letter 17. The current Management Framework Plan for the Resource Area provided for the maintenance of big game populations at 1976 levels.
- K. Refer to response to comment C of Comment Letter 17.

RESPONSE TO ORAL TESTIMONY 1

- L. Plant phenological data collected on winter sheep ranges show that Colorado wildrye, blue grasses and other key species grow at least 1 to 2 inches by March 15 in many years. Early spring growth is highly dependent upon weather conditions and as such, fluctuates annually. Proposed spring rest requirements would be flexible in response to these variable conditions with scheduled rest periods to start at the beginning of green-up and not on any fixed date such as March 15.
- M. Specific grazing systems were not proposed in the DEIS. It is anticipated that most allotments would be managed under deferred rotational systems and would be flexible in terms of turn out dates, duration of use, etc. in response to prevailing forage conditions in given allotments.
- N. The course of action is proposed (DEIS, page 9).
- O. The methodology for determining range condition and trend is found in Appendix E.
- P. Refer to response to comment C of Comment Letter 17.

ORAL TESTIMONY 2

13

1 I want to apologize for more permittees not being here. I'm
2 sure they would be, but when they've got a mouthpiece like me,
3 they let me take care of all of their problems.

4 Thank you.

5 JUDGE HALE: Thank you, Mr. Theos.

6 NICK THEOS: If you've got any questions, I'll be glad
7 to answer them. Dave, you said you had a fistful?

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9 take. Thank you, Nick.

10 JUDGE HALE: Our next speaker is Mr. Gus R. Halandras.
11 GUS R. HALANDRAS: Mr. Chairman, Curt, employees of
12 the Interior Department, and concerned citizens.

13 I really came here as a listener. I had no intention
14 of speaking. However, I wish to repeat what Nick has said and
15 add a few comments of my own that I think might be appropriate.

16 My name is Gus Halandras. I live in Meeker; born
17 here; rancher and educator, businessman; and I'm also a permittee.
18 My brother and I operate a viable sheep ranch. We feel it is
19 among the better ones in the area, because we love what we're
20 doing and we love what we have.

21 Since we are here specifically to talk about your
22 draft, let me get down to that. I am kind of like Nick: I
23 feel that maybe the room is not full of concerned citizens not
24 only because they are busy, but because maybe they've given up.
25 It is almost impossible to fight city hall any more, and you're

ORAL TESTIMONY 2

14

1 considered city hall, because you can play with our lives and
2 our livelihoods and we have nothing to say about it. You can

3 write a \$10 million impact statement that says that the
4 Halandras Brothers permit should be cut 55 percent, substantiating
5 your figures with statistics taken from 30 years back, or new
6 figures taken from the driest year on record. We can't compete
7 with that kind of a thing.

8 Down the line when the food lines outlengthen the
9 gas lines, let it not be a cross that you bear that there is
10 no one out here producing food because they couldn't afford to or
11 they were chased out.

12 The statistics, gentlemen, are totally outdated, in
13 my opinion. The permit that we run on with 1500 to 2500 sheep
14 30 years ago ran maybe 10,000 head. And we supplement our
15 sheep with supplemental feed in times of drought or in times of
16 heavy snows, where I know that 30 and 40 years ago they didn't
17 do that, because they were harder. We operate differently.

18 No one seems to care that times have changed. When
19 the gas lines are formed and there is no gas, who is going to
20 come to these lands that have been newly designated recreation
21 or wildlife refuges? How will the urban Denverite or the man
22 from Salt Lake come out here and harvest this crop that is
23 supposedly here of deer and elk? He can't buy gas, much less
24 he probably doesn't have any food.

25 We probably ought to stock up our shelves with maybe

ORAL TESTIMONY 2

15

1 some weaponry so we can protect ourselves from the influx that
2 will make it here trying to take what is available here because
3 we have our little gardens and maybe a few animals left on some
4 of the few private lands. But the public lands are going to be
5 barren of livelihood.

6 If you cut our permits 55 percent we are going to be
7 out of business. Just that is it. It is hard enough to try to
8 run at half mast, trying to protect the other half, allowing the
9 cushion there. You may go down a few extra numbers and may have
10 a dry year, or may have something that you yourself are planning
11 for.

12 Now, my brother and I did not build this ranch. We
13 purchased the original holdings from our parents. Since the
14 purchase we've developed it and expanded it and we've put
15 together probably one of the better ones. But, you know, there's
16 no future in us passing it on to our kids. I'm going to tell my
17 kids, "We'll try to keep the private land. Maybe you can come
18 back and find some peace of mind from your urban hectic life.
19 But go on, become a professional, do whatever you can, but
20 there is no future for you in agriculture as you now know it,
21 or knew it, or as we operate."

22 The very things that prevent your analysis from saying
23 that we shouldn't be given a stock increase are your own
24 policies. Now many times have my brother and I come into your
25 offices and said, "Boy, there's a place down there that needs

ORAL TESTIMONY 2

16

1 a reservoir; needs it bad." And you would say, "By God, Gus,
2 we just don't have the funds. Maybe next year." "And maybe
3 next year. And maybe next year." But we don't even ask any more.

4 One time we snuck a bulldozer in there and built a
5 little pond there, because there was a seep there, and we got
6 water. But we sort of covered up and said we were cleaning out
7 an existing hole. But that is the way you're forced to operate.

8 But if you read a little, it says that permit and
9 every neighbor's permit around there is subject to a cut of from
10 30 to 75 percent. Some of these permits around this area are
11 subject to 75 percent cuts. We had just as well say, "Get out
12 of agriculture," as do it.

13 In my opinion your draft, and some of these drafts, is
14 really window-dressing. You are forced to write this by somebody
15 back east that says that is the law. Well, the law is of men
16 and for men, and if it can't fit men, then, one or the other
17 should be eliminated.

18 You know, you can tell me that there's a three year
19 interim period and that we'll study this thing together and maybe
20 you'll get to keep your same number, or might even get an
21 increase. But to me that is kind of like throwing dice. And I
22 don't really like to gamble. I detest Las Vegas, and I don't
23 like to throw dice here either.

24 Because what took almost two lifetimes to put together
25 -- and I'm speaking of our family, and I don't know that the

ORAL TESTIMONY 2

17

1 third family will be there, because I'm not going to urge my
2 children to come back to the land.

3 You drive up and down these roads and if you can find
4 a better use for these lands that you drive through than
5 livestock, along with all of the multiple uses that can be put
6 there side by side, you tell me.

7 You have to consider leaving everybody there. The
8 man on the ground is taking as good a care of his asset, whether
9 it be his private piece or his public permit, as anyone else,
10 because he wants to be there next year and the following year.
11 and hopefully his family to carry on.

12 I don't really believe that a permittee is willing
13 to slit his own throat. What would you do for Mt. St. Helena
14 if she blew her stack? I'm sure you can't expect that in an
15 EIS, but what she has done has greatly affected over 150,000
16 square miles, and maybe more, and she may continue to keep
17 popping off. What an effect is that going to have, you know?
18 That ash would come down here on our permits and that will
19 probably somehow or other affect us. What are we going to say
20 in this draft about that? That is kind of beyond our control.

21 In 1977 there was a lot of rain. In January we were
22 hauling water to the sheep. That's ridiculous, you know:
23 hauling water in January in this country. But it happened.
24 And then you go out and take those statistics; that's not
25 exactly fair.

ORAL TESTIMONY 2

18

1 I, for one, do not think that the American public can
2 cut off its nose to spite its face. You can't squeeze agriculture
3 out. We could talk about agriculture and the depressed prices
4 for agriculture. It doesn't matter any more how much money you
5 play with, and agriculture plays with a lot of money, but what
6 is left. There is nothing left.

7 So you cut the permits and you make it harder. What
8 have you done? You haven't really improved the land. What is
9 better, a sheep camp or a cow camp out there, or 25 four-wheel-
10 drives, if they can get their gas?

11 President Carter called for a seven percent inflation
12 rate control. You know, we weren't supposed to go beyond seven
13 percent hopefully each year. And yet I almost think that the
14 grazing fee raise that we got this year was well over 20
15 percent, or something like that.

16 Where in the hell does this money go? It doesn't come
17 back to the land. How come seven percent is good for the left
18 hand and not good for the right?

19 I just -- I have to get personal. I would like to be
20 able to say to my kids that, you know, this may not be enough
21 here for all of you, but maybe one of you can stay with the
22 ranch. Because, now, my brother has a family, too. Now, either
23 we get a bigger ranch, or we expend our interests somewhere else.

24 So, I would like to say to one of my sons, you know,
25 there's enough there for one of you. Which one of you it will

ORAL TESTIMONY 2

19

1 be I don't know. But I can't tell him that, because I'm not
2 doing him a favor, because everything that I make a living with
3 now is out of my control -- the Bureau of Land Management, the
4 Forest Service, the public pressures.

5 You can't sleep calmly by making a livelihood on
6 public lands because you don't know if you will be there tomorrow.
7 And if you can't be there and keep an attractive economical
8 unit, why be there at all?

9 So, if there is any room for change, I suggest that
10 change be governed by reasonableness and practicality. If you
11 write your statement, dictating as it is written now, there is
12 no reason to have a hearing because I don't think anything will
13 change.

14 Thank you.

15 JUDGE HALE: Thank you, Mr. Halandras. I have no
16 other speakers on my list. Is there anyone present that would
17 like to make a statement?

18 I see no hands raised. So, this hearing will be
19 recessed until 7:00 p.m., and we will be back at that time and
20 hopefully with a larger audience and more speakers.

21 Thank you.

22 (The hearing was recessed at 1:42 p.m.)
23
24
25

RESPONSE TO ORAL TESTIMONY 2

Response to Oral Testimony 2

Cus B. Halandras

A. Refer to the response to comment A of Comment Letter 22.

B. If condition and trend data are accurate in cases where rangelands have declining trends, then it will be difficult to continue grazing livestock at levels that caused this condition and still expect to remain in business over the long term when the natural productivity of these rangelands are depleted. Inaccuracies in condition and trend data are expected to be corrected in the three year monitoring and study program.

C. Refer to the response to comment F of Comment Letter 22.

D. There is no gamble concerning livestock use adjustments. The deciding factor is whether or not the rangeland in question has the capacity to respond to management and be capable of producing enough forage on a sustained yield basis, to support a viable livestock operation and other resource requirements.

E. Only one alternative considered in the DEIS would totally eliminate livestock grazing. Three of the other five alternatives (Alternative A, D, and F) would provide livestock forage use levels above that presently occurring.

The multiple uses on public lands must exist together on a sustained yield. The Bureau's first responsibility is to adjust these multiple uses to the sustained yield of the vegetation upon which they depend.

F. Refer to the response to comment A of Comment Letter 22.

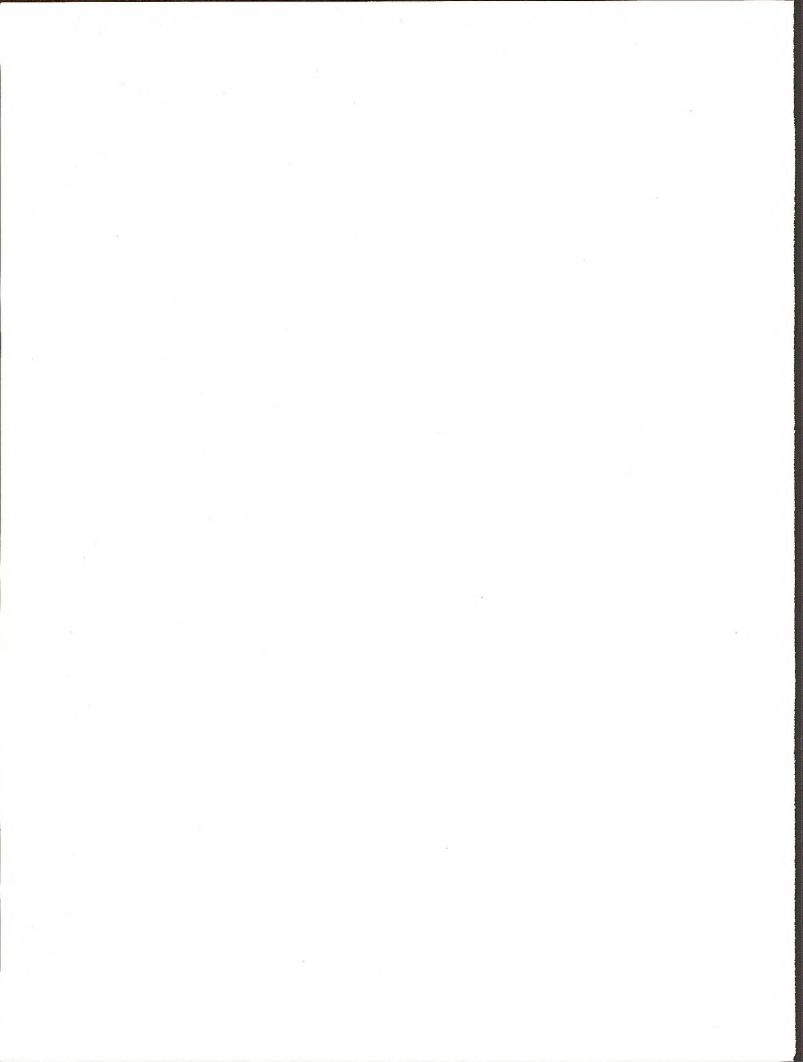
G. Grazing fees are determined by a formula mandated by the Public Rangelands Improvement Act of 1978. The formula required under the Act is known as the Technical Committee Formula. The components of the formula include a forage value index derived from the rate paid for grazing on comparable private land, the beef cattle price index, and a price paid index which relates to the cost of production. The grazing fee would have been \$2.77 for 1980 but the act limits the increase or decrease in any given year to 25 percent.

H. Grazing fee monies do come back to the land. Fifty percent of grazing fee money is returned to the BLM for range improvement. Twenty-five percent of the money collected by BLM in a given state is returned back to the State earmarked for range improvements on public lands in the county in which it was collected. The Craig District receives 25 percent of the grazing fee monies collected within the District which is used for range improvements on public lands throughout the District.

SECTION 7
REVISIONS TO THE DRAFT EIS



Section 2
Description of the Alternatives



REVISIONS TO DEIS PAGE 7

Wild Horse Management Area (Alternative A)

At present, 625 wild horses utilize 443,979 acres of public land within 14 livestock allotments. The wild horse range would be reduced to 148,153 acres of public land within three livestock allotments (Map 2-1).

A minimum of 90 and a maximum of 140 wild horses would be maintained within the 148,153 acre range. The proposed initial vegetation allocation would provide 1,350 AUMs of forage to maintain 90 horses. This allocation level would require the removal of 276 wild horses from within the proposed 148,153 acre horse range. The long term allocation would provide 2,101 AUMs to maintain 140 horses.

The area of the proposed wild horse range was chosen because it has the most concentrated wild horse use (their preferred habitat), has reliable sources of water during late summer along the Cathedral Bluffs, and has a balance between summer and winter range. Fences are not presently a barrier to wild horse movements within this range. Horses are able to move through natural livestock barriers and open gates between allotments. No new fences would be constructed in this area and gates would be left open when livestock are not being grazed.

Increased oil and gas production within the recognized wild horse areas and the increased forage requirements for wild horses has created an expansion of the wild horse range. Complete removal of wild horses would occur in these areas (Map 2-1) with a total of 259 horses being removed.

The area west of Douglas Creek is within the Rangely Natural Gas Field. Extensive gas development has already taken place there with a projected surface disturbance of 7,795 acres in the next 5 years. Because their habitat has been, and would continue to be, disturbed with the development of drill pads, pipelines, roads and by a great increase in human activity, the wild horse population would be removed from this area. The disturbance which has occurred

in this area has forced wild horses to expand into areas not previously occupied by wild horses. The projected development to take place in this area in the next five years would create further expansion of the wild horse range.

The remaining wild horse range proposed for total horse removal is north of the proposed wild horse range. Total removal has been proposed based on ecological factors. The area contains a large amount of critical deer winter range with horses competing with deer for space during winter. The area contains eight individual allotments which are entirely fenced or have natural barriers to both horses and livestock. Water is seasonally lacking (summer and fall) on these allotments, and wild horses have to migrate through open gates from winter range on the lower allotments to summer range on the higher allotments. Because of the small horse herd size, critical deer winter range, insufficient stable watering places, and inadequate summer range, this area was proposed for total wild horse removal.

Wild horses which are gathered and removed would be adopted out to individuals through the BLM's Adopt-A-Wild Horse program.

REVISIONS TO DEIS PAGES 10 AND 12

COSTS OF IMPLEMENTATION (Alternative A)

All allotment management plans and their respective range improvements would be subject to cost-benefit analysis. The estimated cost of implementing the action proposal would be (Table 2-3 and 2-4):

- 1) Construction related costs - \$5,745,159
- 2) Annual maintenance costs - \$ 162,890

Total cost of implementing the wild horse reduction over the next 20 years would be \$337,410 at 1979 prices. Initial wild horse removals would be achieved in 3 years at a cost of \$293,410. This figure includes the helicopter capture, transportation, administration, and adoption expenses totaling \$370

per horse. These removals would reduce the population to 90 head. Maintaining the wild horse population within the desired range would require removal of approximately 50 horses every 4 years. These horses would be removed by hay baiting and water trapping at \$220 per horse or \$44,000 over a 15 year period.

ADMINISTRATION OF GRAZING MANAGEMENT

The action proposal would be administered and managed through standard BLM operating procedures. Each livestock operator would be issued a grazing permit. The permit would specify allotment, period of use, numbers, and kinds of livestock that would be allowed to use the allotment. Trailing permits would continue to be issued for use of the established stock trails and driveways.

Livestock grazing use would be supervised throughout the year. Any changes in the grazing use authorized by the grazing permit must be requested in writing by the livestock operator prior to the grazing period. Changes in authorized grazing use could exceed the limits of the action proposal, if they were consistent with management objectives. Grazing use outside the limits of the proposal and without prior authorization would result in action to assure that any unauthorized grazing use is eliminated in accordance with the regulations governing management of the public lands (43 CFR 4150).

BLM would also make adjustments in the range management program during drought or other emergencies. Such adjustment would be designed to accomplish grazing management objectives. Range condition, competition with wildlife and wild horses, amount of available vegetation and water, and the time of year would be considered in any decision to remove livestock from an area in the event of drought or other temporary problems.

Seven allotments cross the EIS area boundary along the Utah-Colorado border. K Ranch (6307) and Evacuation Creek (6357), administered by the Craig District, have 9,438 acres extending into Utah's Vernal District. These 9,438 acres will be included in proposed AMPs for these two allotments

and will continue to be administered through the Craig District.

Bitter Creek (6358), Park Canyon (6353), Weaver Draw (6344), Stateline (6341), and Bonanza (6310) extend from Utah into Colorado by some 22,207 acres and are administered by Utah's Vernal District. Management of these five allotments will be addressed in the Bookcliffs Grazing (RMP) EIS scheduled to be completed in 1984.

REVISIONS TO DEIS PAGE 14

RANGE IMPROVEMENTS (Alternative B)

No new range improvements would be undertaken or constructed. Existing range improvements would be maintained.

COSTS OF IMPLEMENTATION (Alternative B)

Estimated annual maintenance cost to BLM would be approximately \$60,000. Estimated annual maintenance costs to the permittees would be approximately the same, \$60,000.

Total cost of maintaining the wild horse population at 625 head would be \$555,000 over the 20 year period. Removal of 75 horses would be required annually to maintain the present wild horse population.

REVISIONS TO DEIS PAGE 16

COSTS OF IMPLEMENTATION (Alternative C)

Elimination of livestock grazing from public lands in the EIS area would incur costs for both BLM and livestock operators. An undetermined cost for payment of salvage rights for range improvements which livestock operators have on public land would be incurred by BLM.

REVISIONS TO DEIS PAGE 19

IMPLEMENTATION (Alternative D)

Implementation of this alternative would occur as discussed in Alternative A with full implementation occurring 8 years after filing of the final Environmental Impact Statement. Adjustments proposed in livestock, wild horse, and big game wildlife grazing use as shown in the initial allocation of Table 2-7 (Appendix B, Table B-3 for each allotment) would be fully implemented within 3 years following filing of the statement.

COSTS OF IMPLEMENTATION (Alternative D)

In addition to the costs associated with Alternative A (Tables 2-3 and 2-4), an additional cost of 14 miles of fence would occur under this alternative (\$42,000). Total estimated cost of implementing this alternative would be \$5,787,159 for construction related costs and \$163,940 annual maintenance costs. No added BLM personnel above that required in Alternative A (ten added positions during implementation, three after) would be required.

Total costs of implementing the wild horse program over the next 20 years would be \$298,670. Cost of initial wild horse removals by 1983 would be \$274,910. After the initial population reduction, approximately 6 horses would be removed annually by hay baiting or water trapping the desired number.

REVISIONS TO DEIS PAGE 21

COSTS OF IMPLEMENTATION (Alternative E)

The estimated cost of implementing this alternative would be \$3,096,550 initial construction related costs and \$50,356 annual maintenance costs (Table 2-11).

Total cost of implementing the wild horse removal over the next 20 years would be an additional \$424,060. Horses would be removed from 11

allotments (excluding Square S, Yellow Creek, and Cathedral Bluffs) over a 3 year period at a total cost of \$120,250. In 1981, 179 horses would be removed from Square S, Yellow Creek, and Cathedral Bluffs to reduce the population to 280. After this initial removal, horses would be removed every 4 years. Costs of removal on the designated horse range would be \$304,510 over the next 20 years.

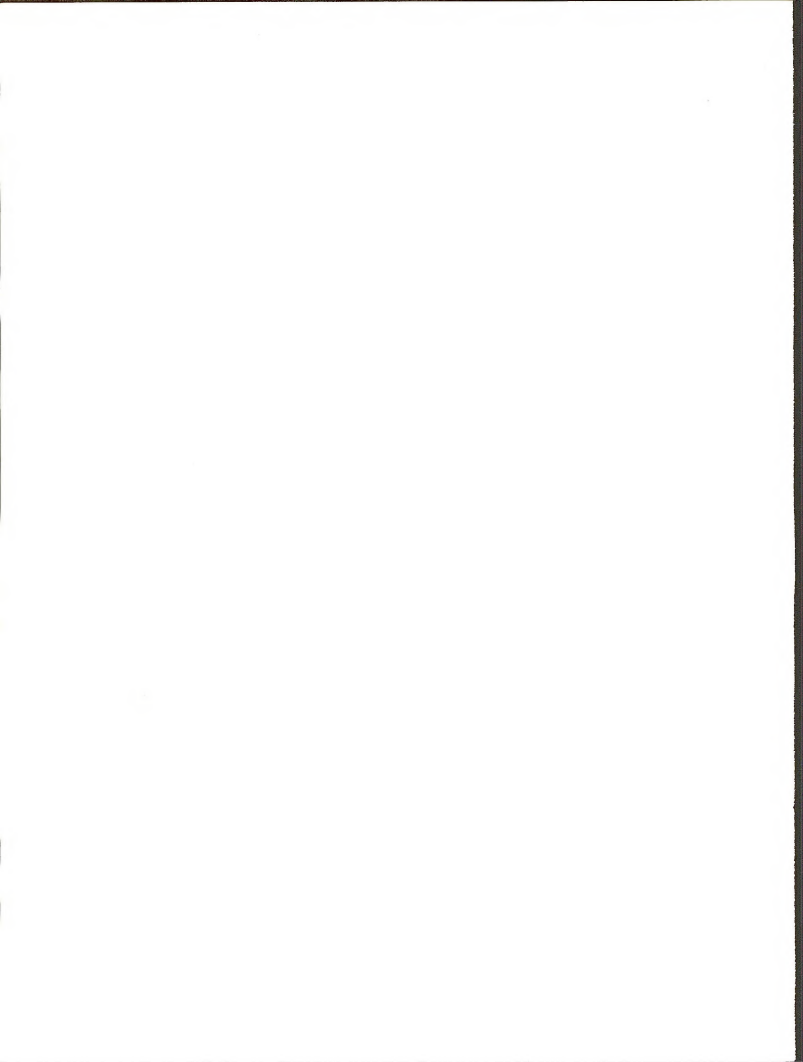
REVISIONS TO DEIS PAGE 27

COSTS OF IMPLEMENTATION (Alternative F)

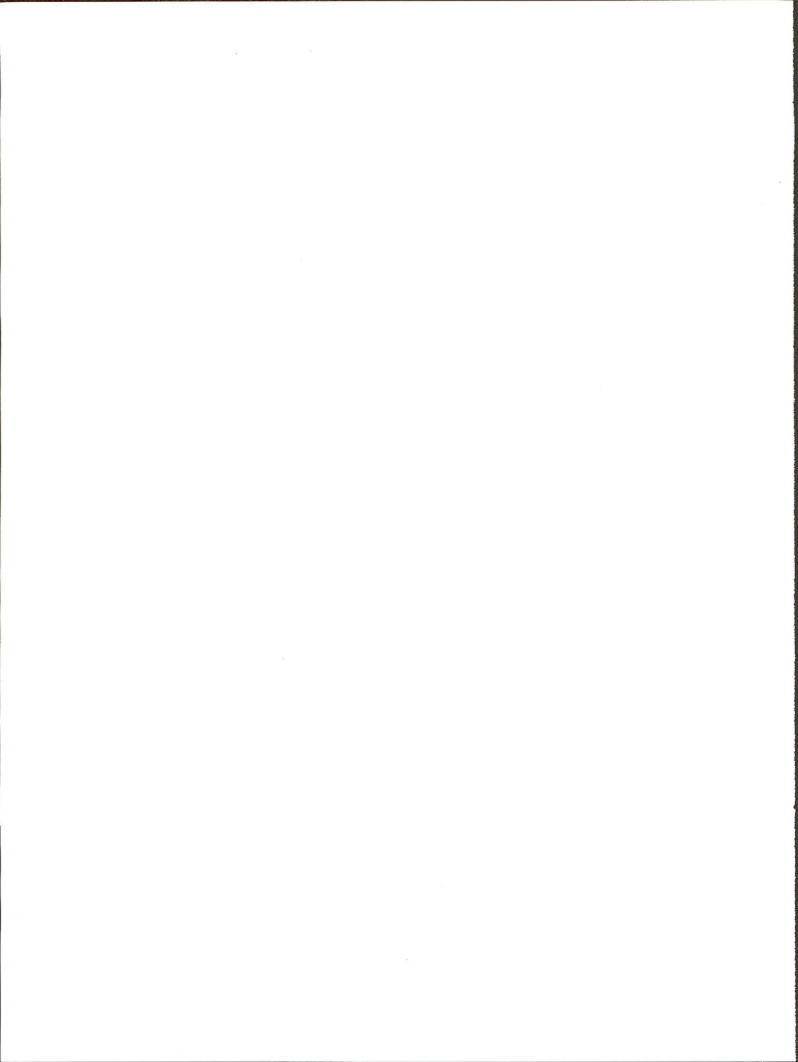
The estimated costs of implementing this alternative would be \$5,220,195 in initial construction related costs and \$125,668 in annual maintenance costs (Tables 2-15 and 2-17).

Additional BLM personnel requirements would be the same as proposed in Alternative A, ten additional positions during implementation and three additional positions after implementation.

Total cost of implementing the wild horse program over the next 20 years would be \$740,000. Removal of 500 wild horses would be required every fifth year to maintain the wild horse population between 700 and 1,125.



Section 3
Affected Environment



REVISIONS TO DEIS PAGE 57

TERRESTRIAL VEGETATION

Discussion will center around major vegetation types occurring in the EIS area with emphasis on existing composition, condition and trend, cover, and productivity. Condition and trend information, presented by vegetation type and suitability class in Table 3-5, refers to livestock forage condition and trend as opposed to ecological condition and trend.

Livestock forage condition is measured by the amounts of desirable livestock forage plants present in a given area while ecological condition is measured by the composition of plants that would occur in relation to the potential climax community in the same area. Areas such as the saltbush vegetation type in the EIS area, however, can be in good livestock forage condition and good ecological condition at the same time, since similar plants characterize both conditions. Map 3-4 depicts the major vegetation types by locality. Methodology for determination of condition and trend is found in Appendix E.

REVISIONS TO DEIS PAGE 67

THREATENED AND ENDANGERED PLANTS

There are at least 13 plant species that are known to occur in the EIS area that are currently being reviewed for proposed threatened or endangered status on the Federal Register. The past official status of each species, its location, habitat, and elevation range, as well as associated plants, taxonomic difficulties, number of known populations, and the estimated individuals per population are referenced in Appendix E. Information on these sensitive plant species in the EIS area is lacking due to limited survey coverage.

One area of major concern is Raven Ridge, just northwest of Rangely. This particular outcrop of the Green River Formation harbors several sensitive plant species. Among these are *Eriogonum ophedroides*,

Astragalus detritalus, *Parthenium ligulatum*, *Penstemon grahamii*, and *Cryptantha rollinsii*.

Cathedral Bluffs is another area of concern, given the occurrence of *Astragalus lutosus* and *Aquilegia barnebyi*. It is suspected that *Festuca dasyclada* may also be present.

REVISIONS TO DEIS PAGE 72

Sage Grouse

Historically, northwest Colorado produced the largest sage grouse populations in the State. Since 1953, previous population declines have been reversed and current population trends are considered stable in the EIS area.

Much of the approximately 516,000 acres of sage grouse range (Map 3-9) is considered yearlong habitat. Summer and winter ranges largely overlap during average winters. Some populations move to lower elevations during severe winters. There are about 250,000 acres of potential nesting and brood habitat in the EIS area.

Nesting, brooding, and winter habitat conditions are probably the major factors regulating population levels and productivity. Nesting and brooding habitats are generally in fair condition while winter habitat appears to be in good condition.

Krager (1977) found indications in the Piceance Basin that sage grouse nesting density is greatest within a 2 mile radius of strutting grounds. Juvenile grouse are dependent upon forbs, insects, and grasses until they are about 12 weeks old. Throughout the rest of the year, and especially during winter, both juveniles and adults are almost totally dependent upon sagebrush for food. Sage grouse distribution is associated with available water throughout the summer.

TABLE 3-5 (REVISED)
LIVESTOCK RANGE CONDITION AND TREND BY VEGETATION TYPE AND SUITABILITY CLASS

Vegetation Type Name	Total	Poor		Fair		Good		Total	
		3/ Suitable	Unsuitable 4/	Suitable	Unsuitable	Suitable	Unsuitable	Suitable	Unsuitable
Grassland	48,306	0	0	36,496	0	11,810	0	48,306	0
Sagebrush	473,732	46,586	1,441	364,632	23,275	37,798	0	449,016	24,716
Mountain Shrub	226,046	3,919	2,724	168,472	42,118	5,993	2,820	178,384	47,662
Pinyon-Juniper	495,081	151,499	47,842	194,759	91,651	5,505	3,825	351,763	143,318
Saltbush	61,119	25,019	0	29,366	88	6,646	0	61,031	88
Greasewood	44,767	35,974	0	8,793	0	0	0	44,767	0
Broadleaf	13,294	2,060	900	7,879	685	1,770	0	11,709	1,585
Conifer	21,790	691	2,569	10,354	5,334	2,842	0	13,887	7,903
Barren	4,261	0	4,261	0	0	0	0	0	4,261
Waste	120,570	0	120,570	0	0	0	0	0	120,570
Unallotted Lands	3,240	0	0	3,240	0	0	0	3,240	0
Livestock Driveways	9,600	0	0	9,600	0	0	0	9,600	0
	1,521,806	265,748	180,307	833,591	163,151	72,364	6,645	1,171,703	350,103
Condition Class Totals			446,055		996,742		79,009		

Vegetation Type Name	Total	Range Trend 2/		Declining		Total	
		Improving	Static	Suitable	Unsuitable	Suitable	Unsuitable
Grassland	48,306	3,269	0	43,933	0	1,104	0
Sagebrush	473,732	8,424	0	367,519	24,716	73,073	0
Mountain Shrub	226,046	16,939	0	130,597	47,662	30,848	0
Pinyon-Juniper	495,081	1,347	0	273,445	143,318	76,971	0
Saltbush	61,119	678	0	53,212	88	7,141	0
Greasewood	44,767	1,041	0	38,793	0	4,933	0
Broadleaf	13,294	0	0	9,662	1,585	2,047	0
Conifer	21,790	0	0	11,750	7,903	2,137	0
Barren	4,261	0	0	4,261	0	0	0
Waste	120,570	0	0	120,570	0	0	0
Unallotted Lands	3,240	0	0	3,240	0	0	0
Livestock Driveways	9,600	0	0	9,600	0	0	0
	1,521,806	31,698	0	941,751	350,103	198,254	0
Trend Class Totals			31,698		1,291,854		198,254

1/ Range Condition - relation between present and potential capability of rangeland

2/ Range Trend - The direction of change in range condition

3/ Suitable range - Range suitable for livestock grazing

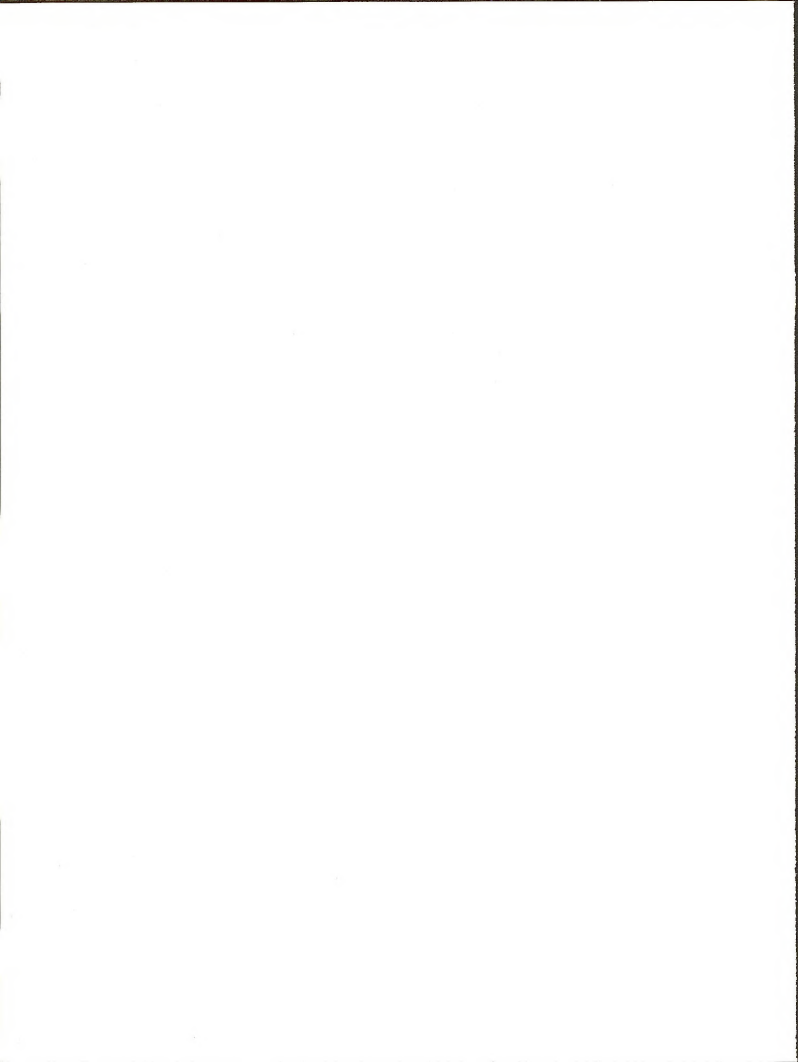
4/ Unsuitable range - Range, which due to slope, access or low forage productivity, is unsuitable for livestock grazing

REVISIONS TO DEIS PAGES 88 AND 90

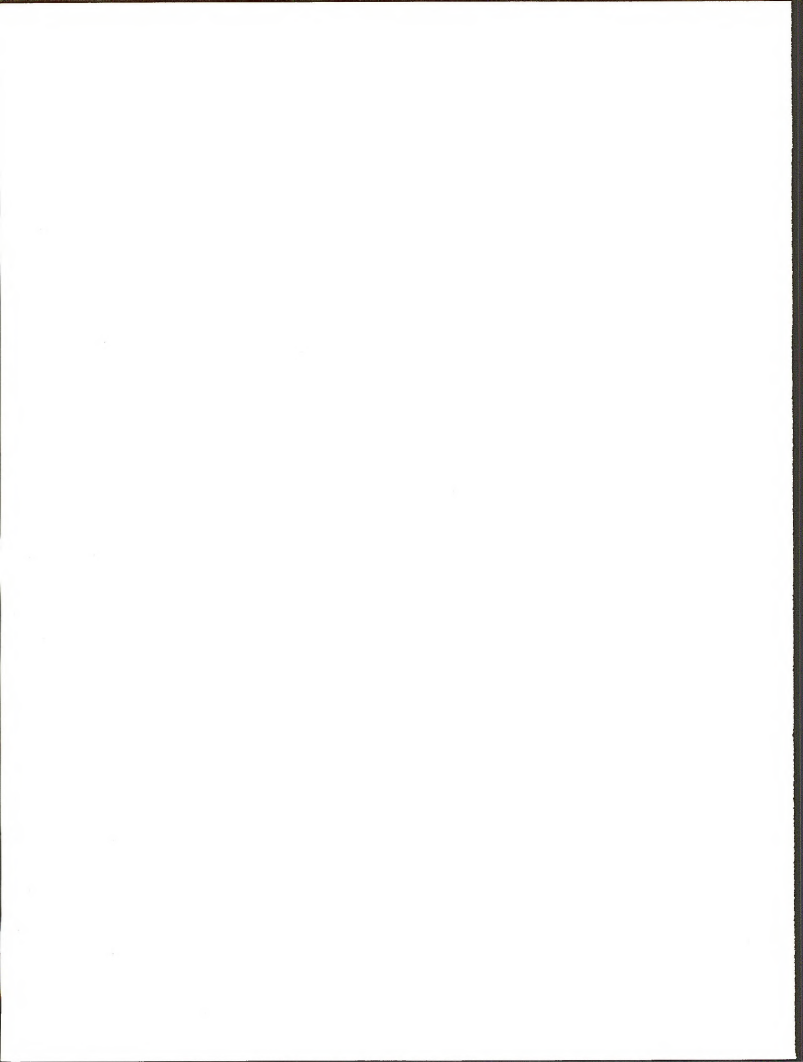
Second column, last paragraph

Range suitability is a major problem in the EIS area. Livestock distribution is severely hampered by steep rugged terrain, most of which lies along the major tributaries draining the area. Based on BLM guidelines, which takes into account degree of slope and associated soil erosion in present condition, vegetation cover, water availability, and vegetation productive potential; 684,813 acres are suitable for livestock grazing while 350,103 acres are unsuitable. The remaining 486,890 acres are considered potentially suitable. Potentially suitable ranges are areas that have adequate forage but lack water or access necessary to manage livestock effectively. When range improvements are developed in these areas, potentially suitable range would become suitable for livestock grazing.

Unsuitable ranges are characterized as being too steep or rugged for livestock use, too low in productivity to support livestock, or too inaccessible to justify the expense of range improvements that could possibly place these areas into the potentially suitable category.



Section 4
Environmental Consequences



REVISIONS TO DEIS PAGE 134

Impacts on Riparian Vegetation

This section discusses the expected changes in riparian vegetation caused by the action proposal. Conclusions were based on subjective analyses of the impacts of vegetation allocation, grazing management, and range improvements proposed for each allotment on the vegetation composition, condition and trend, and vegetation ground cover in each allotment.

Support for the conclusions presented here were based to a large extent on professional judgement, and to a smaller degree on inferences drawn from research and professional papers. This was due to the paucity of scientific research into cause and effect relationships between specific grazing management plans and their impacts on riparian vegetation. The preponderance of research in this field deals primarily with grazing versus exclusion. Therefore, it was felt that it would not be fair to evaluate the range management recommendations set forth in this alternative solely on these studies. A summary of impacts is presented in Appendix E.

REVISIONS TO DEIS PAGE 144

IMPACTS ON SAGE GROUSE

Sage grouse were not directly allocated vegetation, however, they would indirectly benefit from increased understory production resulting from livestock reductions. Their seasonal preference for herbaceous plants is well documented in the literature.

The action proposal would increase herbaceous production and leave 50 percent of current annual growth ungrazed. Both increased understory abundance and residual cover would improve nesting, brooding, and adult summer habitats. Increased insect and forb abundance would especially benefit young birds and could improve population productivity.

Krager (1977) estimated peak of the hatch occurring about June 10 in the Piceance Basin. Since this is about the average livestock turn out date under proposed minimum rest cycles, nest disturbance from livestock grazing would be significantly alleviated compared with the present situation.

About 41,000 acres of sage grouse habitat would be manipulated. Most of the sage grouse range in the EIS area supports yearlong populations. Given a lack of specific information on seasonal movements and activity use areas, all vegetation manipulation could be detrimental if the most critical life function requirements (nesting, brooding, and winter habitats) are not provided for on each treated site. Thus, where winter range overlaps brood range, small created openings could benefit brood range but lower the quality of winter range. The selection by grouse of meadows and small openings for brood habitat (Carr 1968, Savage 1969, Oakleaf 1971, Wallestad 1971, Klebenow 1972) would suggest that grouse use could be enhanced in extensive, dense sagebrush stands by creating small interspersed openings. In other areas, thinning of dense stands to predetermined levels (as described in Carpenter 1974, Krager 1977, Nevenschwander 1980) could also improve brood habitat and provide increased acreage of nesting habitat.

Spraying (2, 4-D) projects would result in high forb mortality if conducted after snowmelt when forbs are beginning spring growth. Kills of greater than 40 to 60 percent on sagebrush would reduce habitat quality by eliminating effective cover and reducing forb abundance (Krager 1977).

In general, short and long term impacts would largely benefit sage grouse and their habitat if sagebrush manipulations are limited in size and percent kill and irregularly shaped. Seasonally differing habitat requirements would be fulfilled by creating interspersed stands of varying vegetation age class structure, density, and composition. Brood habitat possesses the greatest potential and need for improvement and could be accomplished by careful design and implementation of proposed manipulations.

Water development on summer range could increase the acreage of usable summer habitat and improve habitat quality through more uniform livestock distribution. Habitat conditions on approximately 241,000 acres of nesting, brooding, and summer habitats would improve, in response to increased herbaceous production, vegetation manipulations, and water development.

REVISIONS TO DEIS PAGES 147 AND 149

IMPACTS ON FISH

Impacts to fish habitat would generally result in either improved or stabilized conditions. In only one case is a decline expected to continue. Improvements would lead to increases in riparian vegetation ground cover which would enhance streambank stability, reshape channel morphology, provide protective cover, decrease sedimentation, increase the food supply, and regulate water temperatures through shading. By improving bank stability, less caving, sloughing, and soil erosion would occur. This would result in less stream siltation, which would reduce or eliminate the smothering effect on eggs, sensitive young fish, and aquatic insects which serve as fish food. The reshaping of channel morphology would be exhibited by undercut banks, providing excellent trout habitat, and by improved pool and riffle areas. Pools and riffles would be enhanced by the introduction of large organic debris, such as logs, limbs, and stems, which collect in jams and pockets, and change flow patterns. Increased flow patterns would scour streambeds to provide spawning sites or dig holes to provide resting areas. Overhanging vegetation would provide protective cover, regulate water temperatures for spawning and incubation of eggs, and provide food through falling insects.

Table 4-10 indicates long term trends on game fish habitat for streams and reservoirs within the EIS area. Improvement in fish habitat would occur on approximately 45 miles of stream flowing through public lands largely as the result of improvement in riparian vegetation. It should be noted, however, that the resultant improvements in fish populations would be marginal at best. The limiting factor which

would inhibit a major improvement in numbers of fish would be stream size (width and depth) which restricts carrying capacities. The potential for angling use would not be increased.

The fencing of 12.5 miles of stream along Trappers, Lake, and Soldier Creeks would provide for the greatest improvement in fish habitat by completely protecting the riparian communities. This action would greatly enhance the survivability of the Colorado cutthroat trout populations inhabiting these three streams.

No change in fish habitat would occur along 26 miles of public stream. Included here are 12 miles along the White River and 4.5 miles along Piceance Creek. Improved watershed conditions would decrease the sediment loads in these streams, however, these changes would not be substantial enough to improve fish habitat. Public segments of these streams are generally short and intermittent along the entire length separated by long stretches of private or state owned stream. Public portions comprise less than 10 percent of both streams. For this reason, impacts resulting from activities on public owned stream frontage would be negligible.

Fish habitat in Divide Creek reservoir, and the reservoirs on West and Bitter Creeks would not change substantially. Divide Creek reservoir has been previously fenced. Livestock reductions would not be sufficient to reduce the impacts on bottom disturbance by wading livestock in the reservoirs on West and Bitter Creeks.

A decline in the fish habitat along the 3 miles of Brush Creek would occur as a result of the declining riparian conditions, causing a loss in cover, increase in siltation, and a decrease in available food organisms.

REVISIONS TO DEIS PAGE 153

IMPACTS ON SAGE GROUSE HUNTING

Increased opportunities for sage grouse hunting would occur under all alternatives except the No

Action Alternative. Because local hunters exert most of the hunting demand, actual hunter-days used would not increase unless local human populations increased. Projected increases in sage grouse populations and potential increases in hunter-days used would both be unquantifiable due to a lack of data.

Note: New heading and paragraph inserted after Impacts on Big Game Hunting.

REVISIONS TO DEIS PAGE 169

Impacts on Aquatic Wildlife

Continuation of present grazing management practices would result in the maintenance of those riparian communities presently showing a stable trend, and a decline in those presently exhibiting a declining trend. Those impacts on the riparian zones associated with 78 perennial streams would induce similar impacts on aquatic habitat, since riparian vegetation plays a key role in shaping both the physical and biotic structure of the aquatic ecosystem.

Table 4-22 depicts long term trends in fish habitat in the EIS area. Fish habitat would improve along six miles of Trappers Creek due to improved riparian conditions following the exclusion of livestock by fencing. This fencing would occur as a result of implementing current habitat management plans. Fish habitat would remain unchanged along 46 miles of streams on public lands. This would be caused by continued heavy to moderate use by livestock along streambanks, suppressing vegetation growth essential for improvement of the aquatic ecosystem and fish habitat.

Aquatic life in the White River would continue to be influenced by the land use practices, primarily agricultural, on the private lands adjacent to the river. Since public segments along the river are generally small, no direct impacts would occur as a result of grazing on public lands. Fish habitat would decline along 21 miles of streams as a result of continued heavy grazing in those riparian communities presently

exhibiting a declining trend. Continued grazing along these areas would lead to a loss of vegetation cover, reduced streambank stability, and increased stream siltation.

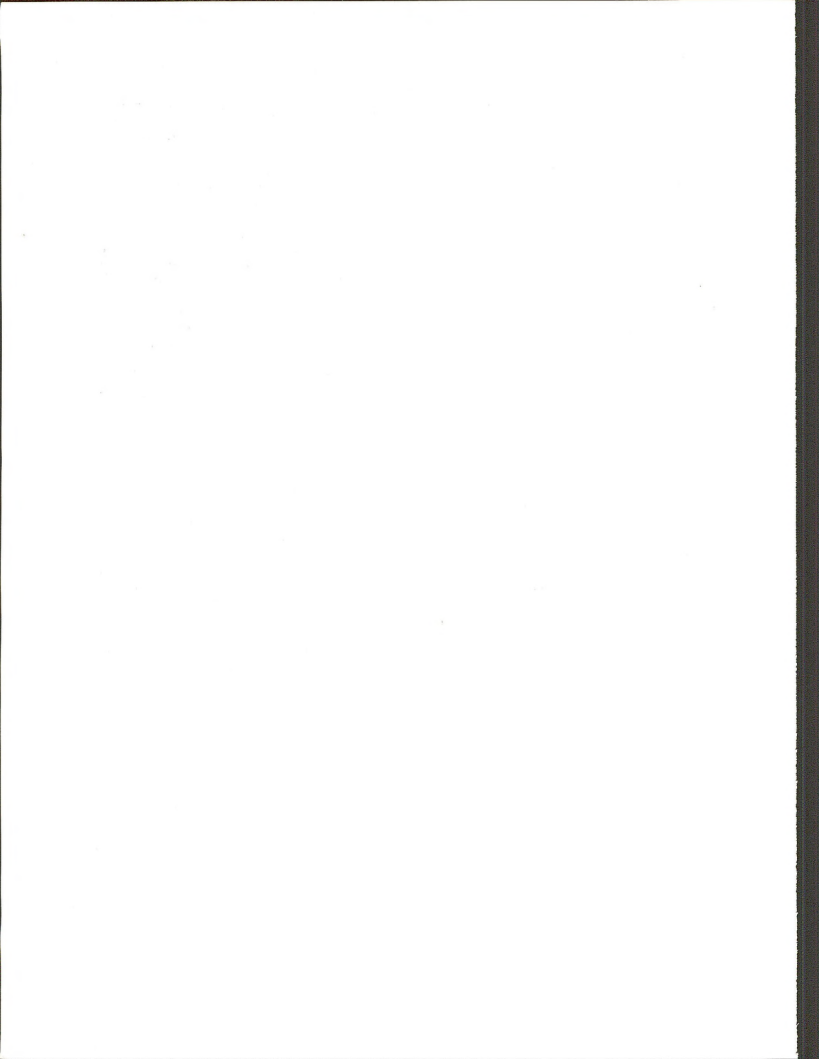
No impacts on aquatic life and fish habitat in the Divide Creek reservoir would occur due to previous fencing of the reservoir. The aquatic life and existing fish habitat in the reservoirs on West Creek and Bitter Creek would be influenced by impacts on the streams above the reservoirs. Continued removal of riparian vegetation and trampling of streambanks would increase sediment loads, which should settle out under normal conditions as water velocities slow upon entry into the reservoirs. It is possible that these reservoirs could be filled with sediment by the year 2000.

Since little or no angling use occurs in the EIS area, no impact on angling use would be expected from this alternative.

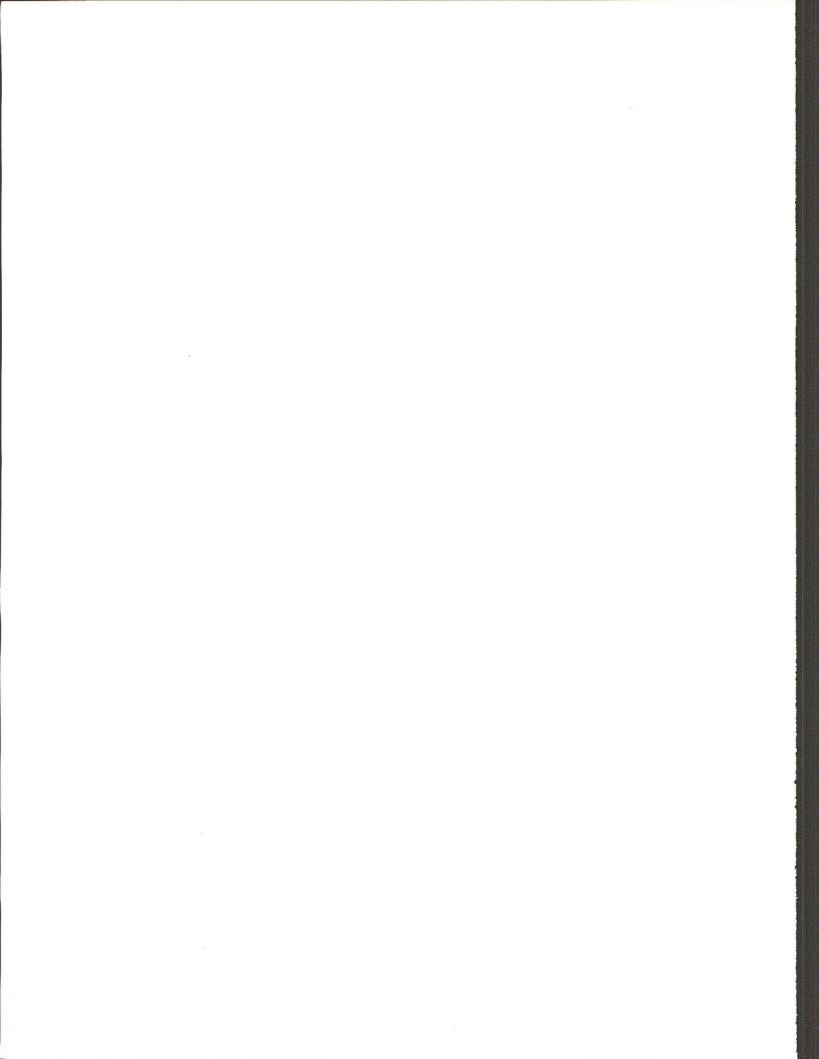
REVISIONS TO DEIS PAGE 172

The projected declining habitat values on sage grouse nesting and brood range could lead to lower populations. This could translate into lower sage grouse hunting opportunities. Impacts would be unquantifiable, due to a lack of data on both the degree to which grouse populations could decline and on sage grouse hunter days in the EIS area.

Note: Make this the last paragraph under Impacts on Recreation Resources (which starts on page 171).



References Cited



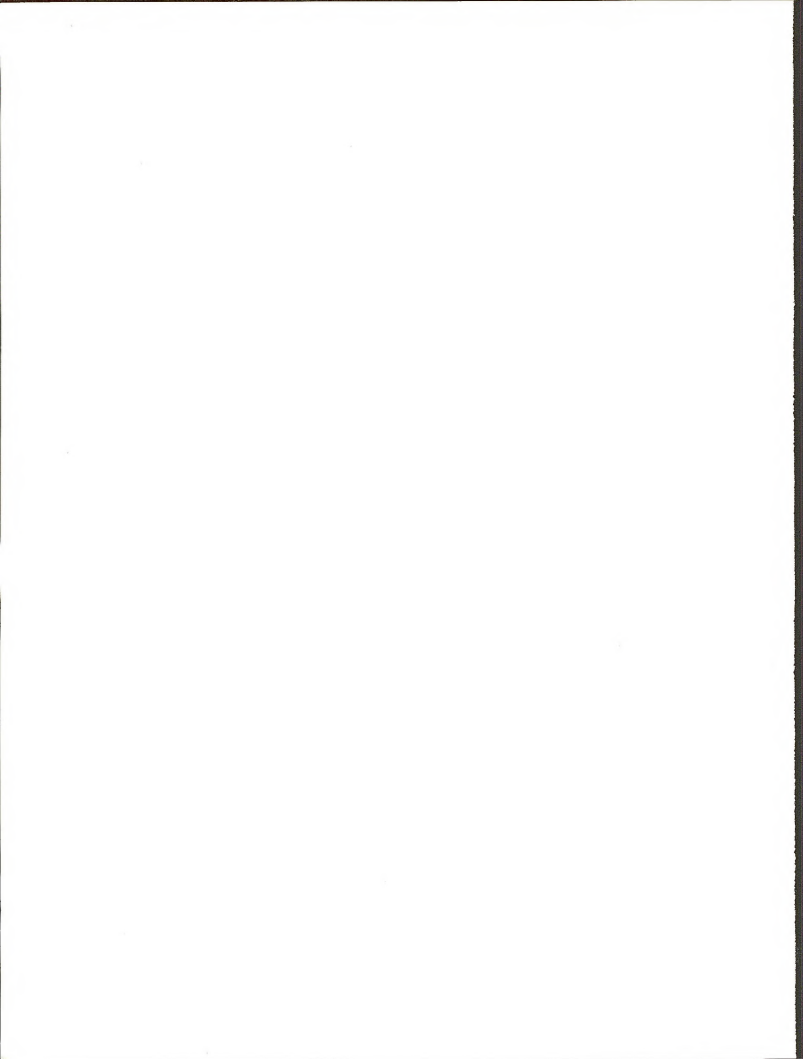
ADDENDUM TO REFERENCES CITED

DEIS PAGES 334-337

- Carpenter, L. H. 1974. Middle Park deer study - range fertilization. Colorado Division Wildlife Game Research Division Federal Aid Project W-38-R-28. *Game Research Report, July, Part Two* pages 183-195.
- Klebenow, D. A. 1972. The habitat requirements of sage grouse and the role of fire in management. *Tall Timbers Fire Ecology Conference No. 12* June 8-9, 1972.
- National Academy of Sciences. 1973. 3rd ed. *Nutrient Requirements of Horses*. Nutrient Requirements of Domestic Animals Series. No. 6 Washington, D.C.
- Nevenschwander, L. F. 1980. Broadcast burning of sagebrush in the winter. *J. Range Management* 33(3):233-236.
- Oakleaf, R. J. 1971. *The Relationship of Sage Grouse to Upland Meadows in Nevada*. Job Final Report Federal Aid Project W-48-2. Nevada Department of Fish and Game 64 pp.
- Savage, D.E. 1969. The relationship of sage grouse to upland meadows in Nevada. *Transaction Annual Meeting California-Nevada Section, The Wildlife Society* 16:8-17.
- Wallestad, R.O. 1971. Summer movements and habitat use by sage grouse broods in central Montana. *J. Wildlife Management* 35:129-136.



ERRATA



ERRATA

Page 1

1. First column, second paragraph, first sentence: "Domestic livestock grazing first occurred ..."

The sentence should now read: "Livestock grazing first occurred ..."

2. Second column, first partial paragraph, first partial sentence: "... range conditions, provide quality habitat for wildlife and wild horses, provide a continuous supply of livestock forage ..."

The sentence should now read: "... habitat for wildlife and wild horses, provide for the protection and improvement of riparian habitats, provide a continuous supply ..."

Page 6 (and following pages where applicable)

Table 2-2

The allotments K-Ranch (6307) and Evacuation Creek (6357) should be increased in acreage of public lands by 4,363 and 5,075 acres respectively with a corresponding increase in livestock AUMs of 238 and 334 respectively (Refer to revised "Administration of Grazing Management" section, DEIS, page 12). Increased livestock AUMs (238 and 334 AUMs) should be added to "Authorized Livestock Use", "Livestock Actual Use", "Initial Allocation-Livestock", and "Projected Allocation-Livestock" for these two allotments. These increases should be added to all tables where these two allotments are listed separately or where they are listed together with other allotments under the yearlong cattle use category, "Cattle Sp/Su/F/W". All totals including these two allotments should be increased in acreage and AUMs by the same amounts in tables and narrative.

Page 9

1. Second column, fourth complete paragraph, first full sentence: "Vegetation Manipulation may be needed on 186,00 acres ..."

The sentence should read: "... may be needed on 186,310 acres ..."

2. Second column, fourth complete paragraph, second full sentence: "... would include treatment of 11,137 acres ..."

The sentence should read: "... would include treatment of 111,137 acres ..."

Page 10

First column, Item 1, second full sentence: "... formal consultation with the U.S. Fish and Wildlife Service would be initiated."

The sentence should read: "... with the U.S. Fish and Wildlife Service and Colorado DOW would be initiated."

Page 15 (and following pages where applicable)

Second column, fourth paragraph, first sentence: "... the same 107,000 acre ..."

All references to the proposed reduction in acreage to the present wild horse range should be changed from "107,000 acres" to "148,153 acres".

Page 33

Table 2-18

Changes in Ranch Income under Alternative D long term column reads: "+24,507".

The number should read: "+240,507".

Page 35

Second column, fourth complete paragraph, second full sentence: "... would be reduced by 15,826 days der the No Action ..."

The sentence should read: "... by 15,826 days under the ..."

Page 39

First column, first complete paragraph, eighth full sentence: "... livestock grazing levels would be reduced by 48 percent ..."

The sentence should read: "... would be reduced 52 percent in the short term ..."

Page 41

Map 2-1

The proposed wild horse use area depicted on the map is: "Cathedral Bluffs, Pasture C of Square S, and Box Elder."

The proposed wild horse use area depicted on the map should include: "Cathedral Bluffs, Pasture C of Square S, and Yellow Creek which includes Box Elder, Barcus Pinto Gulch, and Rocky Ridge."

Page 53

Second column, second complete paragraph, last full sentence: "Major watersheds are depicted on Map 3-2."

The sentence should read: "Watersheds by grazing stations are depicted on Map 3-2."

Page 59

1. First column, third complete paragraph, first full sentence: "The pinyon juniper type grows ..."

The sentence should read: "The pinyon-juniper type ..."

2. First column, last paragraph, first full sentence: "... consists of mixed saltbush and segebrush stands."

The sentence should read: "... saltbush and sagebrush stands."

Page 63

Bottom photo caption: "Natural fires in the pinyon-juniper ..."

The caption should read: "Burned areas as a result of natural fires in the pinyon-juniper type make up about 5,000 acres of the grassland type in the EIS area."

Page 66

First column, second paragraph, second full sentence: "... upper elevation drainages on northern exosures."

The sentence should read: "... upper elevation drainages on northern exposures."

Page 67

1. First column, third and fourth complete paragraph: "Threatened and Endangered Plants"

All references in the paragraphs to "T/E plants" should be changed to "sensitive plants".

2. Second column, first complete paragraph, first full sentence: "The White River deer herd was considered ..."

The sentence should read: "... deer herd is considered ..."

Page 69

1. First column, second complete paragraph, last full sentence: "... has converted sagebrush-grassland complexes into dominant grasslands."

The sentence should read: "... sagebrush-grassland complexes into dominant grasslands."

2. Second column, first partial paragraph, first partial sentence: "... EIS area, are that elk populations increase by 8 prctent."

The sentence should read: "... elk populations increase by 8 percent."

3. Second column, second complete paragraph, first full sentence: "Summer and winter rages generally occur ..."

The sentence should read: "Summer and winter ranges generally occur ..."

4. Second column, third complete paragraph, last full sentence: "... grasses and forbs generally comprise ..."

The sentence should read: "... grasses and shrubs generally comprise ..."

5. Second column, fourth complete paragraph, last full sentence: "Hunting pressure and energy development are limiting the rate of increase in the White River elk herd."

The sentence should be changed to read: "Colorado DOW harvest regulations and energy development appear to be influencing populations in the White River elk herd."

6. Second column, last paragraph, first full sentence: "About 77 percent of the antelope habit is in poor condition ..."

The sentence should read: "... antelope habitat is in ..."

Page 72

1. First column, last partial paragraph, first full sentence: "One hundred ninety-five species have been observed ..."

The sentence should read: "Two hundred twelve species ..."

2. Second column, fourth complete paragraph, first full sentence: "The whooping crane has been observed once in the EIS area."

The sentence should read: "... has been observed twice ..."

3. Second column, fourth complete paragraph, second full sentence: "... from new Mexico to Idaho."

The sentence should read: "... from New Mexico to Idaho."

Page 73

Second column, third complete paragraph, last sentence: "... Colorado cutthroat trout, *Salmo clarki pleuriticus*."

The sentence should read: "... *Salmo clarki pleuriticus* (Map 3-10)."

Page 80

1. First column, first complete paragraph, second full sentence: "... Canyon Pintado Historic District, Duck Creek pickup Village ..."

The sentence should read: "Canyon Pintado Historic District, Duck Creek Wickiup Village ..."

2. First paragraph, last paragraph, fourth full sentence: "... an assessment is made of the opportunities for recreation ..."

The sentence should read: "... is made of the opportunities for recreation ..."

Page 87

1. First column, second complete paragraph, last full sentence: "This puts greater pressure on the inadequacy housing market ..."

The sentence should read: "... on the inadequate housing market ..."

2. Second column, under: Livestock Grazing, second paragraph, first sentence: "Public land ... provides 22 percent ... forage requirements of 621,732 AUMs."

The sentence should now read: "Public land ... provides 21 percent ... forage requirements of 647,752 AUMs."

Page 88

First column, first partial paragraph, first partial sentence: "... approximately 34,821 cattle, ... forage requirements amount to 417,852, 203,880, and 1,320 AUMs respectively."

The sentence should now read: "... approximately 36,851 cattle, ... forage requirements amount to 442,222, 203,880, and 1,650 AUMs respectively."

Page 95

Map 3-2: "Major Watersheds"

The title should read: "Watersheds by Grazing Stations"

Page 125

Second column, Item 10: "Colorado Division of Wildlife would properly manage wildlife ..."

The sentence should read: "Colorado Division of Wildlife would manage wildlife ..."

Page 127

1. First column, last paragraph, first sentence: "... would improve soil erosion ... and over the long term ..."

The sentence should now read: "would maintain soil erosion ... and improve over the long term ..."

2. Second column, fourth paragraph, second sentence: Delete sentence and replace with "Permits for proposed water developments would be obtained from the Colorado State Engineer before the projects are implemented."

3. Second column, fifth paragraph, first sentence: "... over the long term, amounting to only ..."

The sentence should now read: "... over the long term with the increased use amounting to only ..."

4. Second column, sixth paragraph: "Different physical and chemical factors ... (USDI 1978)."

Delete this paragraph.

Page 132

1. First column, third complete paragraph, first full sentence: "... natural seed sources, extend of range improvements ..."

The sentence should read: "... natural seed sources, extent of range improvements ..."

2. Second column, third complete paragraph, second sentence: "Desirable species ... would average 17 percent of 243,538 acres."

The sentence should now read: "Desirable species ... would average 17 percent on 243,538 acres."

3. Second column, third complete paragraph, fourth full sentence: "at the same time, wildlife use of shrubs could reduce ..."

The sentence should read: "At the same time, livestock and wildlife use of shrubs ..."

Page 134

1. First column, fourth complete paragraph, second full sentence: "This was the primarily to the paucity of research publications ..."

The sentence should read: "This was due primarily to the paucity of ..."

2. First column, last complete paragraph, last full sentence: "Substantial reductions (greater than 30 to 50 percent) would probably ..."

The sentence should read: "Substantial reductions (greater than 30 percent) would probably ..."

Page 136

1. First column, fourth complete paragraph, first full sentence: "... would come about as a result of the various ranger improvements."

The sentence should read: "... of the various range improvements."

2. Second column, fourth complete paragraph, first sentence: "A total of 221 acres ... fair to poor."

The sentence should read: "A total of 201 acres ... fair to poor."

Page 137

1. Second column, first complete paragraph, first full sentence: "The specialization of many threatened and endangered (T/E) plant species ..."

The sentence should read: "The specialization of many sensitive plant species ..."

2. Second column, third complete paragraph, second full sentence: "This particular outcrop of the Green River Formation harbors many T/E plant species."

The sentence should read: "... harbors many sensitive plant species."

Page 147

Second column, second complete paragraph, third full sentence: "... improvements in fish populations would be marginal at best."

The sentence should read: "... would be modest at best."

Page 164

1. First column, second paragraph, first sentence: "Range condition ... would continue to enhance ..."

The sentence should now read: "Range condition ... would continue to reduce ..."

2. First column, fourth paragraph, first sentence: "... vegetation cover could absorb ..."

The sentence should now read: "... vegetation cover would absorb ..."

3. Second column, first paragraph, third sentence: "Runoff ... a 3 percent change ..."

The sentence should now read: "Runoff ... a 3 percent increase ..."

4. Second column, first paragraph, fifth sentence: "For this alternative, ... conditions which is believed not to be significant."

The sentence should read: "For this alternative, ... conditions which is believed not to have a major affect on any resource."

Page 175

Second column, first complete paragraph, first sentence: "For this alternative ... which is believed not to be significant."

This sentence should now read: "For this alternative, ... which is believed not to have a major affect on the White River."

Page 186

Second column, first paragraph, first sentence: "For this alternative, ... believed not to be significant."

This sentence should now read: "For this alternative, ... believed to have no importance."

Page 188

First column, second complete paragraph, first full sentence: "Impacts on T/E plant species ..."

The sentence should read: "Impacts on sensitive plant species ..."

Page 199

Second column, third complete paragraph, fifth sentence: "For this alternative, ... believed not to be significant."

This sentence should now read: "For this alternative, ... believed not to have major importance."

Page 200

Second column, third complete paragraph: "Impacts on Threatened and Endangered Plants".

All references in the paragraph to "T/E plants" should be changed to "sensitive plants".

Page 212

Second column, first partial paragraph, second complete sentence: "For this alternative ... believed not to be significant."

This sentence should now read: "For this alternative, ... believed not to have a major affect on any resource."

Page 214

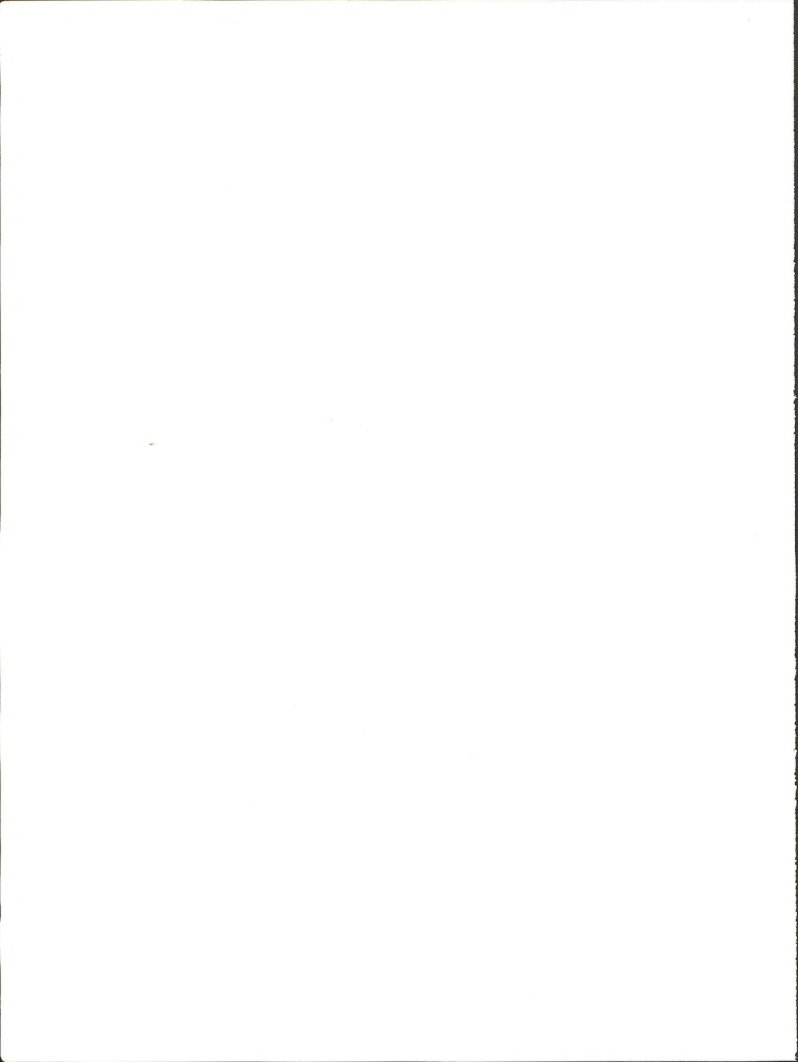
Second column, first complete paragraph, first full sentence: "... impacts upon T/E species ..."

The sentence should read: "... impacts upon sensitive species ..."

Page 316 to 317

Title of Table E-8 "THREATENED AND ENDANGERED PLANT SPECIES"

The title should read: "PLANT SPECIES CURRENTLY BEING REVIEWED AS PROPOSED FOR THREATENED OR ENDANGERED STATUS ON THE FEDERAL REGISTER"



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(June 1984)

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